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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
TUCSON DIVISION**

24 Tohono O’odham Nation, *et al.*,
25 Plaintiffs,

26 v.

27 U.S. Department of the Interior, *et al.*,

No. 4:24-cv-00034-JGZ

**PLAINTIFFS’ MOTION FOR
SUMMARY JUDGMENT**

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Defendants,
and
SunZia Transmission, LLC,
Intervenor-Defendant.

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs Tohono O’odham Nation, San Carlos Apache Tribe, Archaeology Southwest, and the Center for Biological Diversity hereby move for summary judgment in this case challenging Federal Defendants’ unlawful actions in connection with authorizing construction of the SunZia Southwest Transmission Project through the San Pedro Valley, a cultural landscape and Traditional Cultural Property. *See* Compl. ¶¶ 129-38, ECF No. 1-1.

As demonstrated in the accompanying Memorandum in Support of Plaintiffs’ Motion for Summary Judgment (“Memorandum”), there are no material issues in dispute and Plaintiffs are entitled to judgment as a matter of law. Fed. R. Civ. P. 56(a). In support of this motion, Plaintiffs rely on their Memorandum, the statement of facts therein, the cited portions of the Administrative Record, and the Declarations of: Terry Rambler, Chairman and enrolled Tribal Member of the San Carlos Apache Tribe, *see* Mem. Ex. 1; Vernelda Grant, Tribal Historic Preservation Officer and enrolled Tribal member of the San Carlos Apache Tribe, *see* Mem. Ex. 2; Verlon Jose, Chairman and enrolled Tribal Member of the Tohono O’odham Nation, *see* Mem. Ex. 3; Joseph A. Burrell, enrolled Tribal Member of the Tohono O’odham Nation, *see* Mem. Ex. 4; and John R. Welch, Ph.D., Director of ASW, *see* Mem. Ex. 5.

Dated: March 11, 2026

Respectfully submitted,

/s/Elizabeth Lewis
Elizabeth L. Lewis

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2026, I filed the foregoing motion, as well as the accompanying Memorandum in Support and five exhibits thereto, electronically through the CM/ECF system which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

s/Elizabeth L. Lewis
Elizabeth L. Lewis