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**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA**

**THIRD JUDICIAL DISTRICT AT ANCHORAGE**

ROBERT CASSELL, )  
 )  
 Plaintiff, )  
 v. )  
 )  
 STATE OF ALASKA, BOARD OF )  
 GAME, )  
 )  
 Defendant. ) Case No.: 3AN-19-07460CI

**THE HUNTING COALITION'S  
MOTION FOR LEAVE TO FILE AMICUS BRIEF**

Safari Club International, Safari Club International Alaska Chapter, and Alaska Outdoor Council (together, the "Hunting Coalition"), by and through the undersigned attorneys, respectfully move the Court for leave to file an amicus brief in support of Defendant State of Alaska, Board of Game's Opposition to Plaintiff's Motion for Summary Judgment and Cross-Motion for Summary Judgment and in further support of the amicus position of the Alaska Professional Hunters and Guides Association.

The Hunting Coalition are membership organizations that collectively represent over 10,000 Alaskan residents who hunt, fish, and recreate on Alaska's public land. Safari Club International Alaska Chapter and Alaska Outdoor Council are based in Alaska and regularly participate in legislative, regulatory, administrative, and judicial policy-making processes on behalf of Alaskan sportsmen and women. Specifically, both organizations participate in the Board of Game citizen proposal process, and both organizations, and their individual members, provided comments and testimony in opposition to Plaintiff's proposal to change the allocation of resident and non-resident brown bear tags in Game Management Unit 8 (Kodiak Island), which is at issue in this case.

The Hunting Coalition also represents over 44,000 non-resident hunters, many of which visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities, including the hunting of Kodiak brown bears.

In short, the Hunting Coalition represents the views of two unique constituencies: resident hunters who disagree with the Plaintiff's position and recognize the important role that non-residents play in conservation in Alaska; and non-resident hunters who wish to continue to enjoy brown bear hunting on Kodiak Island and who seek to demonstrate that non-residents stand with Alaska residents—not against them. As one example, Safari Club International, which is based in Washington, DC, regularly appears in court to defend Alaskan interests, including the State's interest in sustainably managing wildlife resources for the maximum benefit of all Alaskans. The contributions of non-residents largely fund these advocacy efforts.

This case is of significant public interest to the hunting community and others who wish to preserve a hunting opportunity currently open to non-residents that would be greatly curtailed if Plaintiff succeeds in obtaining the requested relief. The Hunting Coalition's interests on behalf of individual hunters are not adequately represented by Defendant State of Alaska Board of Game or amicus Alaska Professional Hunters Association. The Hunting Coalition also offers a contrasting view to amicus Resident Hunters of Alaska.

This Court has broad discretion to accept an amicus brief. The Hunting Coalition's brief focuses on four issues they believe will aid the Court, particularly with respect to understanding the contributions of non-residents to conservation in Alaska and how these contributions factor into the Constitutional analysis at issue. To avoid any undue burden on this Court, the Hunting Coalition will not seek to file a reply brief or participate in oral argument.

The Hunting Coalition requested the Plaintiff's and Defendant's positions on this Motion. Plaintiff will decide his position in the time allotted after reviewing the Motion and proposed brief. Defendant does not oppose the filing of the Hunting Coalition's amicus brief.

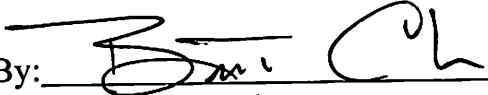
In sum, the Hunting Coalition respectfully requests that the Court grant this Motion and accept the attached brief. A proposed Order is attached for the Court's convenience.

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DATED this 8th day of April, 2021, at Anchorage, Alaska.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 8<sup>th</sup> day of April, 2021, a true and correct copy of the foregoing was served on the following in the manner indicated:

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