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Betty L. Lachar

IN THE NOOKSACK TRIBAL COURT

MICHELLE JOAN ROBERTS, et al.

Case No. 2013-CI-CL-003

Plaintiffs,

Case No. 2014-CI-CL-007

v.

PLAINTIFFS' EMERGENCY MOTION  
TO ENFORCE INJUNCTION ORDERS

ROBERT KELLY, Chairman of the Nooksack  
Tribal Council, et al.

Defendants.

BELMONT, et al.,

Plaintiff,

v.

ROBERT KELLY, Chairman of the Nooksack  
Tribal Council, et al.

Defendants.

For reasons set forth in Plaintiffs' accompanying Response in Opposition to Defendants' "Notice of Compliance," which they filed on February 3, 2015, in each of the above-captioned matters, Plaintiffs request that the Court enforce the Order Enjoining Disenrollment Proceedings in *Roberts v. Kelly*, Case No. 2013-CI-CL-003 (Nooksack Tr. Ct. Mar. 31, 2014), and the

PLAINTIFFS' EMERGENCY MOTION TO ENFORCE INJUNCTION ORDERS

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1 Decision and Order Granting Plaintiffs' Motion for Preliminary Injunction in *Belmont v. Kelly*,  
2 Case No. 2014-CI-CL-007 (Nooksack Tr. Ct. June 12, 2014).

3 Defendants failed to have those two injunction orders dissolved or vacated prior to  
4 recommencing disenrollment proceedings against Plaintiffs on January 30, 2015. As such, they  
5 are in contempt of court. Further, the "approv[al] by the Department of the Interior" cited in the  
6 Notice(s) of Compliance, which approval Defendants admit is "required by" both injunction  
7 orders, is not yet of any legal effect. Notice of Compliance, at 1.

8 For these reasons, the current injunctions must persist, unless or until the Secretary's  
9 approval becomes of legal effect.

10 DATED this 9th day of February, 2015.

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15 Anthony S. Broadman  
16 Ryan D. Dreveskracht  
17 Attorneys for Plaintiffs  
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