

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

THE INTER-TRIBAL COUNCIL	)	
OF ARIZONA, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 15-342L
	)	(Judge Hertling)
	)	
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT  
ON CLAIM I IN THE SECOND AMENDED COMPLAINT  
AND REQUEST FOR ORAL ARGUMENT ON THE MOTION**

Pursuant to RCFCs 7(b) and 56(a), Plaintiff the Inter-Tribal Council of Arizona (ITCA) moves for summary judgment on Claim I (failure to hold in trust sufficient security for Indian education Trust Fund Payments required by the Arizona-Florida Land Exchange Act of 1988, Pub. L. No. 100-696, 102 Stat. 4577, or otherwise make the Trust Fund whole) of its Second Amended Complaint, (ECF No. 58, filed Apr. 16, 2018), on the grounds that there is no genuine dispute as to any material fact in support of this Claim and ITCA is entitled to judgment as a matter of law on the Claim. With its motion, ITCA submits a Memorandum stating with particularity the grounds in support of its motion and a Statement of Undisputed Facts. ITCA requests oral argument on its motion.

Dated this 19th day of April 2024.

Respectfully submitted,

/s/ Melody L. McCoy

Melody L. McCoy

Native American Rights Fund

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