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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

**METLAKATLA INDIAN
COMMUNITY**, a Federally
Recognized Indian Tribe,

Plaintiff,

v.

MICHAEL J. DUNLEAVY, *et al.*,

Defendants.

Case No.: 5:20-cv-00008-SLG

Oral Argument Requested

PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

As detailed extensively in the Community's concurrently filed Opposition to Defendant's Motion for Summary Judgment, incorporated herein by reference in accordance with Local Civil Rule 5.1(f)(2), the undisputed evidence compellingly establishes that the Community's Tsimshian, Tlingit and Haida ancestors, from time immemorial through the creation of the Annette Island Reserve, fished extensively throughout Southeast Alaska in the areas now designated as Districts 1 and 2. Accordingly, the Community is entitled to Judgment as a matter of law that it's reserved fishing rights include Districts 1 and 2.

DATED this 13th day of January, 2026.

HAGLUND KELLEY LLP

By: /s/ Christopher Lundberg

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **PLAINTIFF'S CROSS MOTION FOR SUMMARY JUDGMENT** was filed with the Clerk of the Court for the United States District Court – District of Alaska by using the CM/ECF system. Participants in Case No.: 5:20-cv-00008-SLG who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 13th day of January, 2026.

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