

before then. If the Tribe has political or legal issues that complicate its process for retaining litigation experts, those are issues that should have been recognized and addressed by the Tribe well in advance of December 17, 2014. Indeed, the Tribe was on notice as of November 13, 2014, that Keystone sought a Scheduling Order with a hearing date in March, 2015.

2. The Tribe's motion is a variation on its earlier objections stated when the Scheduling Order was entered. At a hearing on December 9, 2015, the Tribe objected that the proposed Scheduling Order did not allow sufficient time for its processes. The Tribe's objections were overruled. The Tribe offers no reason why the Commission's earlier determination should not stand.

3. In its initial discovery responses to Keystone's written discovery, served on February 6, 2015, the Tribe did not disclose any expert testimony. In supplemental responses served on March 10, the Tribe disclosed two expert witnesses: Linda S. Black Elk, from Fort Yates, North Dakota; and Kevin E. Cahill, of EcoNorthwest, in Boise, Idaho. (Moore Aff. ¶ 2 & Ex. A.) The Tribe disclosed documents supporting the expert testimony of Linda Black Elk, but stated that while Dr. Cahill would testify about "the economic and environmental conditions relating to Keystone XL," the substance of each opinion to which he would testify had "not been fully determined at the present time." The Tribe does not explain why Linda Black Elk's testimony could be timely obtained, but not the testimony of Dr. Cahill. Moreover, Keystone is prepared to meet the testimony of Dr. Cahill, even though the substance of his proposed testimony has not been disclosed as of this late date, as long as his prefiled direct testimony is submitted as required on April 2, 2015.

4. Keystone would be prejudiced by the continuance that the Tribe proposes. Keystone has worked diligently to meet the deadlines in the Scheduling Order. Keystone

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answered 850 interrogatories and document requests, not including subparts, in the initial round of discovery. (Moore Aff.¶ 3.) Keystone answered another 180 interrogatories and document requests, not including subparts, in the second round of discovery. (*Id.*) Keystone is prepared to serve its prefiled direct testimony on April 2; it has arranged its preparations to enable it to meet the deadline for prefiled rebuttal testimony; it is preparing its witnesses for the hearing beginning on May 5; its witnesses have arranged their schedules to appear at the hearing; and Keystone has made travel, hotel, and other logistical arrangements for the hearing. Changing the schedule at this late date for reasons previously stated by the Tribe and rejected by the Commission would prejudice Keystone. Moreover, the Tribe's proposed continuance, which includes a rescheduled hearing in mid-July, would delay this proceeding well beyond the time necessary for resolution given the limited scope of a certification proceeding under SDCL 49-41B-27.

5. The Tribe contends that Keystone failed to comply with discovery, and has filed a separate motion for discovery sanctions, which motion is set for hearing on April 14. Keystone will respond to the merits of the Tribe's arguments in response to that motion. For purposes of this motion, however, the Commission should consider that the Tribe is objecting to discovery answers that were made on February 6, 2015. Counsel for Keystone and the Tribe spoke about the Tribe's concerns on February 24, 2015. (Moore Aff.¶ 4.) Yet the Tribe waited until March 25 to file its motion for discovery sanctions, and until March 27 to file its motion to amend the Scheduling Order. Having failed to act expeditiously, the Tribe should not be heard to complain only three days before its prefiled testimony is due that its dissatisfaction with Keystone's discovery responses served almost two months ago is a basis for amending the Scheduling Order.

6. The Tribe bears the burden of proving good cause for an amendment of the scheduling order. SDCL § 15-6-16 (“[a] schedule shall not be modified except by leave of the judge upon a

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showing of good cause”). The South Dakota Supreme Court has noted that the most relevant factor to consider “is usually the effect that the amendment will have on delaying the ultimate disposition of the case.” *Tosh v. Schwab*, 2007 S.D. 132, ¶ 24, 743 N.W.2d 422, 430.

Ultimately, “a continuance may properly be denied when the party had ample time for preparation or the request for a continuance was not made until the last minute.” *State v. Moeller*, 2000 S.D. 122, ¶ 7, 616 N.W.2d 424, 431.

For all of these reasons, Keystone respectfully requests that the Tribe’s motion to amend the Scheduling Order be denied.

Dated this 30th day of March, 2015.

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/ James E. Moore

William Taylor

James E. Moore

PO Box 5027

300 South Phillips Avenue, Suite 300

Sioux Falls, SD 57117-5027

Phone (605) 336-3890

Fax (605) 339-3357

Email James.Moore@woodsfuller.com

Attorneys for Applicant TransCanada

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of the foregoing Keystone's Response to Standing Rock Sioux Tribe's Motion to Amend Scheduling Order, to the following:

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
patty.vangerpen@state.sd.us

Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
kristen.edwards@state.sd.us

Brian Rounds
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
brian.rounds@state.sd.us

Darren Kearney
Staff Analyst South Dakota Public Utilities
Commission
500 E. Capitol Avenue
Pierre, SD 57501
darren.kearney@state.sd.us

Tony Rogers, Director
Rosebud Sioux Tribe - Tribal Utility
Commission
153 South Main Street
Mission, SD 57555
tuc@rosebudsiouxtribe-nsn.gov

Cindy Myers, R.N.
PO Box 104
Stuart, NE 68780
csmyers77@hotmail.com

Jane Kleeb
1010 North Denver Avenue
Hastings, NE 68901
jane@boldnebraska.org

Byron T. Steskal
Diana L. Steskal
707 E. 2nd Street
Stuart, NE 68780
prairierose@nntc.net

Terry Frisch
Cheryl Frisch
47591 875th Road
Atkinson, NE 68713
tcfrisch@q.com

Arthur R. Tanderup
52343 857th Road
Neligh, NE 68756
atanderu@gmail.com

Lewis GrassRope
PO Box 61
Lower Brule, SD 57548
wisestar8@msn.com

Robert G. Allpress
46165 Badger Road
Naper, NE 68755
bobandnan2008@hotmail.com

Amy Schaffer
PO Box 114
Louisville, NE 68037
amyannschaffer@gmail.com

Benjamin D. Gotschall
6505 W. Davey Road
Raymond, NE 68428
ben@boldnebraska.org

Elizabeth Lone Eagle
PO Box 160
Howes, SD 57748
bethcbest@gmail.com

John H. Harter
28125 307th Avenue
Winner, SD 57580
johnharter11@yahoo.com

Peter Capossela
Peter Capossela, P.C.
Representing Standing Rock Sioux Tribe
PO Box 10643
Eugene, OR 97440
pcapossela@nu-world.com

Jerry P. Jones
22584 US Hwy 14
Midland, SD 57552

Carolyn P. Smith
305 N. 3rd Street
Plainview, NE 68769
peachie_1234@yahoo.com

Jeff Jensen
14376 Laflin Road
Newell, SD 57760
jensen@sdplains.com

Louis T. (Tom) Genung
902 E. 7th Street
Hastings, NE 68901
tg64152@windstream.net

Nancy Hilding
6300 West Elm
Black Hawk, SD 57718
nhilshat@rapidnet.com

Paul F. Seamans
27893 249th Street
Draper, SD 57531
jackknife@goldenwest.net

Viola Waln
PO Box 937
Rosebud, SD 57570
walnranh@goldenwest.net

Wrexie Lainson Bardaglio
9748 Arden Road
Trumansburg, NY 14886
wrexie.bardaglio@gmail.com

Harold C. Frazier
Chairman, Cheyenne River Sioux Tribe
PO Box 590
Eagle Butte, SD 57625
haroldcfrazier@yahoo.com
mailto:kevinckeckler@yahoo.com

Cody Jones
21648 US Hwy 14/63
Midland, SD 57552

Debbie J. Trapp
24952 US Hwy 14
Midland, SD 57552
mtdt@goldenwest.net

Gena M. Parkhurst
2825 Minnewsta Place
Rapid City, SD 57702
GMP66@hotmail.com

Joye Braun
PO Box 484
Eagle Butte, SD 57625
jmbraun57625@gmail.com

Duncan Meisel
350.org
20 Jay St., #1010
Brooklyn, NY 11201
duncan@350.org

The Yankton Sioux Tribe
Robert Flying Hawk, Chairman
PO Box 1153
Wagner, SD 57380
robertflyinghawk@gmail.com
Thomasina Real Bird
Attorney for Yankton Sioux Tribe
trealbird@ndnlaw.com

Bruce Ellison
Attorney for Dakota Rural Action
518 6th Street #6
Rapid City, SD 57701
belli4law@aol.com

Chastity Jewett
1321 Woodridge Drive
Rapid City, SD 57701
chasjewett@gmail.com

RoxAnn Boettcher
Boettcher Organics
86061 Edgewater Avenue
Bassett, NE 68714
boettcherann@abbnebraska.com

Bruce Boettcher
Boettcher Organics
86061 Edgewater Avenue
Bassett, NE 68714
boettcherann@abbnebraska.com

Bonny Kilmurry
47798 888 Road
Atkinson, NE 68713
bjkilmurry@gmail.com

Ronald Fees
17401 Fox Ridge Road
Opal, SD 57758

Robert P. Gough, Secretary
Intertribal Council on Utility Policy
PO Box 25
Rosebud, SD 57570
bobgough@intertribalCOUP.org

Tom BK Goldtooth
Indigenous Environmental Network (IEN)
PO Box 485
Bemidji, MN 56619
ien@igc.org

Dallas Goldtooth
38731 Res Hwy 1
Morton, MN 56270
goldtoothdallas@gmail.com

Gary F. Dorr
27853 292nd
Winner, SD 57580
gfdorr@gmail.com

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Cyril Scott, President
Rosebud Sioux Tribe
PO Box 430
Rosebud, SD 57570
cscott@gwtc.net
ejantoine@hotmail.com

Thomasina Real Bird
Representing Yankton Sioux Tribe
Fredericks Peebles & Morgan LLP
1900 Plaza Dr.
Louisville, CO 80027
trealbird@ndnlaw.com

Frank James
Dakota Rural Action
PO Box 549
Brookings, SD 57006
fejames@dakotarural.org

Tracey A. Zephier
Attorney for Cheyenne River Sioux Tribe
Fredericks Peebles & Morgan LLP
910 5th Street, Suite 104
Rapid City, SD 57701
tzephier@ndnlaw.com

Matthew Rappold
Rappold Law Office
on behalf of Rosebud Sioux Tribe
PO Box 873
Rapid City, SD 57709
matt.rappold01@gmail.com

Kimberly E. Craven
3560 Catalpa Way
Boulder, CO 80304
kimecraven@gmail.com

Paula Antoine
Sicangu Oyate Land Office Coordinator
Rosebud Sioux Tribe
PO Box 658
Rosebud, SD 57570
wopila@gwtc.net
paula.antoine@rosebudsiouxtribe-nsn.gov

Sabrina King
Dakota Rural Action
518 Sixth Street, #6
Rapid City, SD 57701
sabinra@dakotarural.org

Robin S. Martinez
Dakota Rural Action
Martinez Madrigal & Machicao, LLC
616 West 26th Street
Kansas City, MO 64108
robin.martinez@martinezlaw.net

Paul C. Blackburn
4145 20th Avenue South
Minneapolis, MN 55407
paul@paulblackburn.net

April D. McCart
Representing Dakota Rural Action
Certified Paralegal
Martinez Madrigal & Machicao, LLC
616 W. 26th Street
Kansas City, MO 64108
april.mccart@martinezlaw.net

Joy Lashley
Administrative Assistant
SD Public Utilities Commission
joy.lashley@state.sd.us

Mary Turgeon Wynne
Rosebud Sioux Tribe - Tribal Utility
Commission
153 S. Main Street
Mission, SD 57555
tuc@rosebudsiouxtribe-nsn.gov

Eric Antoine
Rosebud Sioux Tribe
PO Box 430
Rosebud, SD 57570
ejantoine@hotmail.com

/s/ James E. Moore

4. On February 24, 2015, counsel for Keystone and the Standing Rock Sioux Tribe spoke by telephone in response to the Tribe's request to discuss the adequacy of Keystone's initial discovery responses to the Tribe's discovery, which were made on February 6, 2015.

Dated this 30th day of March, 2015.



James E. Moore

Subscribed and sworn to before me
this 30th day of March, 2015.



Notary Public – South Dakota
My commission expires: **My Commission Expires
Sept. 13, 2017**

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of the foregoing Affidavit of James E. Moore, to the following:

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
patty.vangerpen@state.sd.us

Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
kristen.edwards@state.sd.us

Brian Rounds
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
brian.rounds@state.sd.us

Darren Kearney
Staff Analyst South Dakota Public Utilities
Commission
500 E. Capitol Avenue
Pierre, SD 57501
darren.kearney@state.sd.us

Tony Rogers, Director
Rosebud Sioux Tribe - Tribal Utility
Commission
153 South Main Street
Mission, SD 57555
tuc@rosebudsiouxtribe-nsn.gov

Jane Kleeb
1010 North Denver Avenue
Hastings, NE 68901
jane@boldnebraska.org

Terry Frisch
Cheryl Frisch
47591 875th Road
Atkinson, NE 68713
tcfrisch@q.com

Lewis GrassRope
PO Box 61
Lower Brule, SD 57548
wisestar8@msn.com

Robert G. Allpress
46165 Badger Road
Naper, NE 68755
bobandnan2008@hotmail.com

Amy Schaffer
PO Box 114
Louisville, NE 68037
amyannschaffer@gmail.com

Benjamin D. Gotschall
6505 W. Davey Road
Raymond, NE 68428
ben@boldnebraska.org

Elizabeth Lone Eagle
PO Box 160
Howes, SD 57748
bethcbest@gmail.com

John H. Harter
28125 307th Avenue
Winner, SD 57580
johnharter11@yahoo.com

Cindy Myers, R.N.
PO Box 104
Stuart, NE 68780
csmyers77@hotmail.com

Byron T. Steskal
Diana L. Steskal
707 E. 2nd Street
Stuart, NE 68780
prairierose@nntc.net

Arthur R. Tanderup
52343 857th Road
Neligh, NE 68756
atanderu@gmail.com

Carolyn P. Smith
305 N. 3rd Street
Plainview, NE 68769
peachie_1234@yahoo.com

Jeff Jensen
14376 Laflin Road
Newell, SD 57760
jensen@sdplains.com

Louis T. (Tom) Genung
902 E. 7th Street
Hastings, NE 68901
tg64152@windstream.net

Nancy Hilding
6300 West Elm
Black Hawk, SD 57718
nhilshat@rapidnet.com

Paul F. Seamans
27893 249th Street
Draper, SD 57531
jacknife@goldenwest.net

Viola Waln
PO Box 937
Rosebud, SD 57570
walnranch@goldenwest.net

Peter Capossela
Peter Capossela, P.C.
Representing Standing Rock Sioux Tribe
PO Box 10643
Eugene, OR 97440
pcapossela@nu-world.com

Wrexie Lainson Bardaglio
9748 Arden Road
Trumansburg, NY 14886
wrexie.bardaglio@gmail.com

Harold C. Frazier
Chairman, Cheyenne River Sioux Tribe
PO Box 590
Eagle Butte, SD 57625
haroldcfrazier@yahoo.com
mailto:kevinckeckler@yahoo.com

Jerry P. Jones
22584 US Hwy 14
Midland, SD 57552

Cody Jones
21648 US Hwy 14/63
Midland, SD 57552

Debbie J. Trapp
24952 US Hwy 14
Midland, SD 57552
mtdt@goldenwest.net

Gena M. Parkhurst
2825 Minnewsta Place
Rapid City, SD 57702
GMP66@hotmail.com

Joye Braun
PO Box 484
Eagle Butte, SD 57625
jmbraun57625@gmail.com

Duncan Meisel
350.org
20 Jay St., #1010
Brooklyn, NY 11201
duncan@350.org

The Yankton Sioux Tribe
Robert Flying Hawk, Chairman
PO Box 1153
Wagner, SD 57380
robertflyinghawk@gmail.com
Thomasina Real Bird
Attorney for Yankton Sioux Tribe
trealbird@ndnlaw.com

Bruce Ellison
Attorney for Dakota Rural Action
518 6th Street #6
Rapid City, SD 57701
belli4law@aol.com

Chastity Jewett
1321 Woodridge Drive
Rapid City, SD 57701
chasjewett@gmail.com

RoxAnn Boettcher
Boettcher Organics
86061 Edgewater Avenue
Bassett, NE 68714
boettcherann@abbnebraska.com

Bruce Boettcher
Boettcher Organics
86061 Edgewater Avenue
Bassett, NE 68714
boettcherann@abbnebraska.com

Bonny Kilmurry
47798 888 Road
Atkinson, NE 68713
bjkilmurry@gmail.com

Robert P. Gough, Secretary
Intertribal Council on Utility Policy
PO Box 25
Rosebud, SD 57570
bobgough@intertribalCOUP.org

Dallas Goldtooth
38731 Res Hwy 1
Morton, MN 56270
goldtoothdallas@gmail.com

Cyril Scott, President
Rosebud Sioux Tribe
PO Box 430
Rosebud, SD 57570
cscott@gwtc.net
ejantoine@hotmail.com

Thomasina Real Bird
Representing Yankton Sioux Tribe
Fredericks Peebles & Morgan LLP
1900 Plaza Dr.
Louisville, CO 80027
trealbird@ndnlaw.com

Frank James
Dakota Rural Action
PO Box 549
Brookings, SD 57006
fejames@dakotarural.org

Tracey A. Zephier
Attorney for Cheyenne River Sioux Tribe
Fredericks Peebles & Morgan LLP
910 5th Street, Suite 104
Rapid City, SD 57701
tzephier@ndnlaw.com

Ronald Fees
17401 Fox Ridge Road
Opal, SD 57758

Tom BK Goldtooth
Indigenous Environmental Network (IEN)
PO Box 485
Bemidji, MN 56619
ien@igc.org

Gary F. Dorr
27853 292nd
Winner, SD 57580
gfdorr@gmail.com

Paula Antoine
Sicangu Oyate Land Office Coordinator
Rosebud Sioux Tribe
PO Box 658
Rosebud, SD 57570
wopila@gwtc.net
paula.antoine@rosebudsiouxtribe-nsn.gov

Sabrina King
Dakota Rural Action
518 Sixth Street, #6
Rapid City, SD 57701
sabinra@dakotarural.org

Robin S. Martinez
Dakota Rural Action
Martinez Madrigal & Machicao, LLC
616 West 26th Street
Kansas City, MO 64108
robin.martinez@martinezlaw.net

Paul C. Blackburn
4145 20th Avenue South
Minneapolis, MN 55407
paul@paulblackburn.net

Matthew Rappold
Rappold Law Office
on behalf of Rosebud Sioux Tribe
PO Box 873
Rapid City, SD 57709
matt.rappold01@gmail.com

Kimberly E. Craven
3560 Catalpa Way
Boulder, CO 80304
kimecraven@gmail.com

Mary Turgeon Wynne
Rosebud Sioux Tribe - Tribal Utility
Commission
153 S. Main Street
Mission, SD 57555
tuc@rosebudsiouxtribe-nsn.gov

April D. McCart
Representing Dakota Rural Action
Certified Paralegal
Martinez Madrigal & Machicao, LLC
616 W. 26th Street
Kansas City, MO 64108
april.mccart@martinezlawn.net

Joy Lashley
Administrative Assistant
SD Public Utilities Commission
joy.lashley@state.sd.us

Eric Antoine
Rosebud Sioux Tribe
PO Box 430
Rosebud, SD 57570
ejantoine@hotmail.com

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/ James E. Moore
William Taylor
James E. Moore
PO Box 5027
300 South Phillips Avenue, Suite 300
Sioux Falls, SD 57117-5027
Phone (605) 336-3890
Fax (605) 339-3357
Email James.Moore@woodsfuller.com
Attorneys for Applicant TransCanada

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE APPLICATION BY)
TRANSCANADA KEYSTONE PIPELINE, LP)
FOR A PERMIT UNDER THE SOUTH DAKOTA)
ENERGY CONVERSION AND TRANSMISSION)
FACILITIES ACT TO CONSTRUCT THE)
KEYSTONE XL PROJECT)

Docket No. HP 14-001

**SUPPLEMENTAL ANSWERS TO INTERROGATORIES AND REQUESTS FOR
DOCUMENTS PROPOUNDED TO THE STANDING ROCK SIOUX TRIBE**

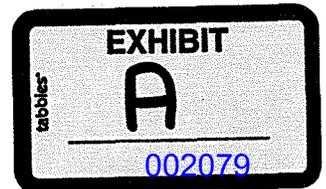
The Standing Rock Sioux Tribe (“Tribe”), by and through undersigned counsel, hereby supplements its answers and objections to the interrogatories and requests for the production of documents served by TransCanada Keystone Pipeline, LP in the above-captioned matter.

INTERROGATORY NO. 3 State the name, current address, and telephone number of each fact witness you intend to call to offer testimony at the evidentiary hearing in this case set for May 2015.

SUPPLEMENTAL ANSWER: Jesse Taken Alive, Standing Rock Sioux Tribal Council, Box D Fort Yates, North Dakota 58538, (701) 854-8500; Phyllis Young, Standing Rock Sioux Tribal Council, Box D, Fort Yates, North Dakota 58538, (701) 854-8500.

INTERROGATORY NO. 4 State the name, current address, and telephone number of each witness whom you intend to call at the evidentiary hearing as an expert witness under SDCL Ch. 19-15, and for each expert, state:

- a. the subject matter on which the expert is expected to testify;
- b. the substance of each opinion to which the expert is expected to



- testify;
- c. the facts supporting each opinion to which the expert is expected to testify;
 - d. the expert's profession or occupation, educational background, specialized training, and employment history relevant to the expert's proposed testimony;
 - e. the expert's previous publications within the preceding 10 years; and
 - f. all other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

SUPPLEMENTAL ANSWER: The Tribe's expert witnesses include Linda S. Black Elk, M.S., 9299 Highway 24, Fort Yates, North Dakota 58538, (701) 854-8044; and Kevin E. Cahill, Ph.D., EcoNorthwest, 223 N. 6th Avenue, Suite 430, Boise, Idaho, 83702, (208) 918-0617.

For Professor Black Elk:

- a. medicinal and culturally-significant plants;
- b. impacts of construction or an inevitable release of tar sands crude on plants with medicinal or culturally-significant uses by the Lakota and Dakota Indians, and the violations of applicable law;
- c. see the Supplemental Answer to Request for Production No. 6;
- d. see the Supplemental Answer to Request for Production No. 8;
- e. see the Supplemental Answer to Request for Production No. 8; and
- f. see the Supplemental Answer to Request for Production No. 8.

For Dr. Cahill:

- a. the economic and environmental conditions relating to Keystone XL, and changes thereto.
- b. this has not been fully determined at the present time.

- c. see the Supplemental Answer to Request for Production No. 6;
- d. see the Supplemental Answer to Request for Production No. 8;
- e. see the Supplemental Answer to Request for Production No. 8;
and
- f. see the Supplemental Answer to Request for Production No. 8.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

1. All documents that you intend to offer as exhibits at the evidentiary hearing in this matter.

SUPPLEMENTAL ANSWER: See attached documents; other documents to be offered as exhibits have not yet been identified.

6. All documents relied on by any expert whose testimony you intend to offer at the evidentiary hearing in this matter.

SUPPLEMENTAL ANSWER: See attached documents; other documents to be offered as exhibits have not yet been identified.

8. A current resume for each expert whose testimony you intend to offer at the evidentiary hearing in this matter.

SUPPLEMENTAL ANSWER: See attached documents.

DATED this 10th day of March, 2015

By: *Peter Capossela*
Peter Capossela, P.C.
Attorney at Law
Post Office Box 10643
Eugene, Oregon 97440
(541) 505-4883
pcapossela@nu-world.com

Attorney for Standing Rock Sioux Tribe