

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

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STATE OF NEW YORK, et al,)	
)	
	Plaintiffs,)	
)	
	v.)	No. 6:08-cv-644 (LEK-DEP)
)	
SALLY JEWELL, Secretary, United States)	
Department of the Interior et al.)	
)	
	Defendants)	
)	
	and)	
)	
ONEIDA NATION OF NEW YORK)	
)	
	Defendant-Intervenor)	
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CAYUGA NATION’S MOTION TO INTERVENE

The Cayuga Nation (“the Nation”), by its undersigned counsel, hereby submits this motion to intervene in the above-captioned litigation pursuant to Federal Rule of Civil Procedure 24. The Nation seeks to intervene for the limited purpose of arguing that the geographic casino gaming exclusivity provision of the proposed Settlement Agreement between the State of New York, the Oneida Indian Nation, Oneida County, and Madison County violates federal law. In support of its motion, the Nation submits a memorandum of law setting forth the basis for intervention, a declaration from its federally recognized representative, and a brief statement of the Nation’s intended objections to the Agreement. Should the Nation’s motion to intervene be granted, the Nation intends to submit a memorandum of law fully detailing its objections.

WHEREFORE, the Nation respectfully requests that this motion to intervene be granted.

Dated: June 12, 2013
Syracuse, New York

Respectfully submitted.

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