## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

	)	
In re FIFRA Section 6(b) Notice of Intent	)	
to Cancel Pesticide Registrations for	)	
<b>Chlorpyrifos Products</b>	)	
•	)	Docket No. FIFRA-HQ-2023-0001
<b>Gharda Chemicals International, Inc. and</b>	)	
<b>Red River Valley Sugarbeet Growers</b>	)	
Association, et al.,	)	
	)	
Petitioners	)	
	)	

## **JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

The parties, the U.S. Environmental Protection Agency ("EPA," "Agency," or "Respondent"), Gharda Chemicals International, Inc. ("Gharda") and Red River Valley Sugarbeet Growers Association, U.S. Beet Sugar Association, American Sugarbeet Growers Association, Southern Minnesota Beet Sugar Cooperative, American Crystal Sugar Company, Minn-Dak Farmers Cooperative, American Farm Bureau Federation, American Soybean Association, Iowa Soybean Association, Minnesota Soybean Growers Association, Missouri Soybean Association, Nebraska Soybean Association, South Dakota Soybean Association, North Dakota Soybean Growers Association, National Association of Wheat Growers, Cherry Marketing Institute, Florida Fruit and Vegetable Association, and Georgia Fruit and Vegetable Growers Association, and National Cotton Council of America ("Growers" and, together with Gharda, "Petitioners"), and Intervenors have conferred regarding the treatment of non-redacted documents that are produced during the course of this hearing under seal and asserted by the producing party to contain confidential business information ("CBI"). Accordingly, the parties

hereby jointly move that the Presiding Officer enter the attached Stipulated Protective Order Governing Confidentiality and Filing Under Seal ("Protective Order"). The proposed Protective Order shall govern the production, use, and submission of Protected Information in the course of the above-captioned action and preclude inappropriate use of such information for purposes other than this action. A proposed order granting this joint motion is attached.

Respectfully submitted,

Dated: September 22, 2023

Forrest Pittman
Angela Huskey
Pesticides and Toxic Substances Law Office
Office of General Counsel
U.S. Environmental Protection Agency

Counsel for Respondent

/s/ (with permission)
Nash E. Long
Javaneh S. Tarter

Hunton Andrews Kurth LLP

America

Growers Association, U.S. Beet Sugar Association,
American Sugarbeet Growers Association, Southern
Minnesota Beet Sugar Cooperative, American Crystal
Sugar Company, Minn-Dak Farmers Cooperative,
American Farm Bureau Federation, American Soybean
Association, Iowa Soybean Association, Minnesota
Soybean Growers Association, Missouri Soybean
Association, Nebraska Soybean Association, South
Dakota Soybean Association, North Dakota Soybean
Growers Association, National Association of Wheat
Growers, Cherry Marketing Institute, Florida Fruit and
Vegetable Association, and Georgia Fruit and Vegetable
Growers Association, and National Cotton Council of

Counsel for Petitioners Red River Valley Sugarbeet

/s/ (with permission)

Patti A. Goldman Noorulanne Jan Earthjustice

Counsel for Intervenors

/s/ (with permission)
Donald C. McLean
Matille G. Bowden
ArentFox Schiff LLP

Counsel for Petitioner Gharda Chemicals International, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing JOINT MOTION FOR ENTRY OF PROTECTIVE

ORDER, dated September 22, 2023, was filed electronically with the U.S. Environmental

Protection Agency, Office of Administrative Law Judges E-filing system, with a copy via

electronic mail to the following:

Nash E. Long Javaneh S. Tarter HUNTON ANDREWS KURTH LLP 101 South Tryon Street, Suite 3500 Charlotte, NC 28280-0008 Telephone: (704) 378-4728 nlong@HuntonAK.com

Counsel for Petitioners Red River Valley Sugarbeet Growers Association, et al.

Donald C. McLean
Kathleen R. Heilman
ARENTFOX SCHIFF, LLP
1717 K Street, N.W.
Washington, DC 20006
Telephone: (202) 857-6000
donald.mclean@afslaw.com
katie.heilman@afslaw.com

jtarter@HuntonAK.com

Counsel for Petitioner Gharda Chemicals International, Inc.

Patti A. Goldman
Noorulanne Jan
Earthjustice
810 3rd Avenue, Suite 610, Seattle, WA 98104
pgoldman@earthjustice.org
njan@earthjustice.org
Counsel for Intervenors League of United Latin American Citizens, et al.

Dated: September 22, 2023

Forrest Pittman
Pesticides and Toxic Substances Law Office
Office of General Counsel
U.S. Environmental Protection Agency

Counsel for Respondent