

**10th CIR. FORM 2. ENTRY OF APPEARANCE AND CERTIFICATE OF
INTERESTED PARTIES UNDER 10th Cir. R. 46.1**

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

Entry of Appearance and Certificate of Interested Parties

STATE OF NEW MEXICO, *ex rel.*
HECTOR H. BALDERAS,
Attorney General, and the NEW
MEXICO ENVIRONMENT
DEPARTMENT,

Petitioners,

v.

UNITED STATES NUCLEAR
REGULATORY COMMISSION
and the UNITED STATES OF
AMERICA,

Respondents.

Case No. **21-9593**

In accordance with 10th Cir. R. 46.1, the undersigned attorney(s) hereby appear(s) as counsel for

Interim Storage Partners, LLC

[Party or Parties]

Intervenor/Respondent, in the
subject case(s).

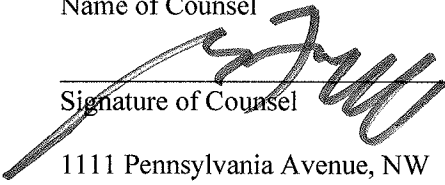
[Appellant/Petitioner or Appellee/Respondent]

Further, in accordance with 10th Cir. R. 46.1, the undersigned certify(ies) as follows: **(Check one.)**

- ☒ On the reverse of this form is a completed certificate of interested parties and/or attorneys not otherwise disclosed, who are now or have been interested in this litigation or any related proceeding. Specifically, counsel should not include in the certificate any attorney or party identified immediately above.
- ☐ There are no such parties, or any such parties have already been disclosed to the court.

Brad Fagg


Name of Counsel


Signature of Counsel

1111 Pennsylvania Avenue, NW
Washington, DC 20004
202-739-5191
Brad.Fagg@morganlewis.com

I hereby certify that a copy of this Entry of Appearance and Certificate of Interested Parties was served on December 8, 2021, via ECF electronic filing and service, to all counsel of record.

(See Fed. R. App. P. 25(b))

(Signature) 

ADDENDUM—CERTIFICATE OF PARTIES AND
CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appeal Procedure 26.1 and Circuit Rule 46.1(D), Interim Storage Partners, LLC represents as follows:

Interim Storage Partners, LLC is a limited liability company organized and existing under the laws of the State of Delaware with principal offices in Andrews, Texas. The sole purpose of Interim Storage Partners, LLC is to license, design, construct and operate the Consolidated Interim Storage Facility at the Waste Control Specialists site in Andrews County, Texas. Interim Storage Partners, LLC is jointly owned by Orano CIS, LLC (51%) and Waste Control Specialists, LLC (49%). No other publicly held company has 10 percent or more equity interest in Interim Storage Partners, LLC.

Orano CIS, LLC is owned 100% by Orano USA, LLC. Orano CIS, LLC and Orano USA, LLC are both limited liability companies formed in the State of Delaware. Orano USA, LLC is 100% owned by Orano SA, a French entity. Orano SA is ultimately majority (70%) owned and controlled by the French State, through two French government entities.

Two Japanese entities (Mitsubishi and Japan Nuclear Fuel) each own a 5% (non-voting) interest in Orano SA. The remaining 20% interest (non-voting) in Orano SA is held in two (non-voting) trusts, in connection with financing arrangements.

Waste Control Specialists, LLC is wholly-owned by Fermi Holdings, Inc., an investment affiliate of J.F. Lehman & Co. The full ownership chain includes several other privately held J.F. Lehman & Co. investment affiliates, with no individual shareholders owning more than 25% of any of the entities.

/s/ Brad Fagg

Brad Fagg

Dated: December 8, 2021