

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL**

**STATE OF WYOMING**

**A PETITION TO THE ENVIORNMENTAL )  
QUALITY COUNCIL FOR DESIGNATION )  
OF AN AREA KNOWN AS SAND CREEK )  
AS RARE OR UNCOMMON )**

**Docket No. 09-1103**

**FILED**  
**OCT 05 2009**  
Jim Ruby, Executive Secretary  
Environmental Quality Council

**MOTION TO STRIKE AND DISMISS**

COMES NOW, John Green, General Partner of Mineral Hill, L.P., which are surface and mineral owners of property located in the Sand Creek area and motions to strike and dismiss the pleading filed by Erik Molvar upon the following grounds and reasons.

Mr. Molvar, is not licensed to practice law in the state of Wyoming. Never the less, he has filed the petition now pending before this council, on behalf of the Biodiversity Conservation Alliance, a corporation.

The Wyoming State Bar has issued a CEASE AND DESIST LETTER to Mr. Molvar, a copy of which is attached and incorporated herein as Exhibit A. The filing of a pleading by a non-lawyer on behalf of a corporation renders the pleading null and void, ab initio.

Wherefore, it is respectfully requested that the petition filed by Mr. Molvar in the above cause be stuck and dismissed and for such other relief as the council would deem appropriate for this outrageous misconduct and deception.

Dated: October 5, 2009

Respectfully submitted,



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CERTIFICATE OF MAILING

I certify that I have this 5<sup>th</sup> day of October, 2009, I mailed the above and foregoing Motion to Strike and Dismiss to the Wyoming Environmental Quality Council, Herschler Bldg., Room 1714, 122 W. 25<sup>th</sup> St., Cheyenne, Wyoming 82002 and faxed it to them at 307-777-6134. I have also mailed a copy to the Attorney General's Office, Administrative Division, 123 Capital Building, 200 W. 24<sup>th</sup> St., Cheyenne, WY 82002.



John Green