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*Attorneys for Plaintiffs The Conservation
Angler and Wild Fish Conservancy*

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILD SALMON RIVERS d/b/a THE
CONSERVATION ANGLER; and WILD FISH
CONSERVANCY,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES SERVICE;
and UNITED STATES DEPARTMENT OF
COMMERCE,

Defendants.

Civil Case No. 2:25-cv-00116

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

INTRODUCTION

1. Plaintiffs The Conservation Angler and Wild Fish Conservancy bring this action under the Endangered Species Act (“ESA”), 16 U.S.C. §§ 1531–1544, against Defendants the National Marine Fisheries Service and the United States Department of Commerce (collectively, “the Service”) for failing to make the statutorily required 12-month finding on Plaintiffs’ August 2022 petition to list Olympic Peninsula steelhead as a threatened or endangered species under the