

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA and the)	
STATE OF INDIANA,)	
)	
Plaintiffs,)	
)	
v.)	Cause No. 2:17-cv-048-PPS
)	
THE SANITARY DISTRICT OF)	
HAMMOND,)	
)	
Defendant.)	
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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE
BY HOOSIER ENVIRONMENTAL COUNCIL**

EXHIBIT LIST

- 1 Letter from H. Max Kelln to Allison C. McGregor re Notice of Force Majeure, Jan. 24, 2025
- 2 Letter from Lynn Kelly to Michael Zoeller, Aug. 18, 2025
- 3 Email from Susanna Bingman to Michael Zoeller, Feb. 25, 2026
- 4 HSD Quarterly Report No. 35, Feb. 6, 2026
- 5 Agreed Protective Order in *Town of Munster v. Sanitary District of Hammond*, Cause No. 45D02-2411-687 (Dec. 16, 2025)
- 6 HSD Quarterly Report No. 30, Nov. 8, 2024
- 7 HSD Quarterly Report No. 25, Aug. 9, 2023
- 8 HSD Quarterly Report No. 28, May 9, 2024
- 9 Complaint in *Munster v. HSD*, Cause No. 45D02-2411-687 (Nov. 1, 2024)
- 10 Town of Griffith Semi-Annual Consent Decree Report, March 1, 2026
- 11 Sanitary District of Highland Semi-Annual Consent Decree Report, Jan. 28, 2026