

ACKNOWLEDGMENT OF SERVICE

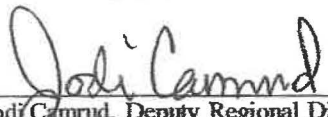
I, Jodi Camrud, Deputy Regional Director, hereby acknowledge that I have received a copy of the following documents in the above-captioned matter:

1. Notice of Appeal;
2. Motion for Expedited Consideration; and
3. Opening Brief of Appellant Northern Cheyenne Tribal Council

I acknowledge that I received these documents on the 7 day of April, 2026.

I understand that by signing this Acknowledgment of Service, I am confirming receipt of the above-referenced documents, but I am not waiving any defenses or objections to the claims asserted in the action.

DATED this 7 day of April, 2026.



Jodi Camrud, Deputy Regional Director

UNITED STATES DEPARTMENT OF THE INTERIOR
INTERIOR BOARD OF INDIAN APPEALS
Washington, D.C.

NORTHERN CHEYENNE TRIBAL COUNCIL,
Appellant,

v.

JODY CAMRUD, DEPUTY REGIONAL DIRECTOR,
Bureau of Indian Affairs,
Appellee.

IBIA Docket No. _____

MOTION FOR EXPEDITED CONSIDERATION

The Northern Cheyenne Tribal Council respectfully moves the Interior Board of Indian Appeals for expedited consideration of this appeal pursuant to 43 C.F.R. § 4.314 and the Board's inherent authority to manage its docket in matters involving urgent governance concerns.

In support of this Motion, Appellant states as follows:

1. This appeal concerns the Bureau of Indian Affairs' refusal to issue a recognition determination identifying the governing body of the Northern Cheyenne Tribe for federal purposes.
2. The absence of a recognition determination has resulted in ongoing instability affecting federal program administration, tribal governance, and government-to-government relations.
3. Since the filing of Appellant's written requests for recognition, additional removal letters have been issued by individuals identifying as "Traditional Chiefs," including removals of both previously elected and subsequently installed council members.
4. These continuing unilateral removals occur without Article VII constitutional process and are declared "final," creating ongoing uncertainty regarding tribal governance authority.
5. The Northern Cheyenne Constitutional Court has determined that the Tribal Council may not initiate suit as a plaintiff to affirm its own authority under the Tribe's Code, rendering the internal remedy the Bureau has suggested structurally unavailable to Appellant.

6. BIA law enforcement previously intervened and materially altered the status quo by arresting and removing elected Council members from tribal offices, thereby intensifying the governance crisis.
7. The ongoing instability directly impacts federal dealings, resolution approvals, program administration, and contractual matters.
8. Delay in resolving this appeal risks continued governance instability, further removals, and de facto recognition consequences without formal determination.

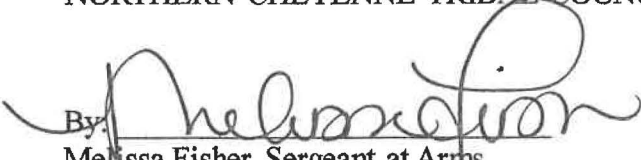
This case presents precisely the type of urgent governance dispute for which expedited consideration is appropriate. The issues are primarily legal and concern federal recognition doctrine under *Goodface v. Grassrope* and compliance with 25 C.F.R. Part 2.

Expedited review will promote stability in federal-tribal relations and prevent further administrative uncertainty.

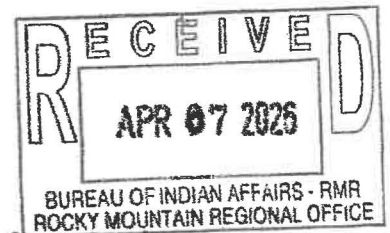
WHEREFORE, Appellant respectfully requests that the Board grant expedited consideration of this appeal and establish an accelerated briefing schedule.

RESPECTFULLY SUBMITTED on this 4 day of April, 2026.

NORTHERN CHEYENNE TRIBAL COUNCIL

By: 

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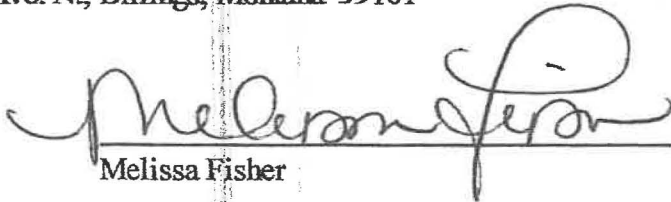


CERTIFICATE OF SERVICE

I certify that on this 7th day of April, 2026, a true and correct copy of the foregoing Motion for Expedited Consideration was served upon: Jodi Camrud

Jodi Camrud, Deputy Regional Director, Bureau of Indian Affairs via:

Personal deliver at: 2021 4th Ave. N., Billings, Montana 59101


Melissa Fisher