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Attorneys for Plaintiff-Intervenor,
 The Association of International Automobile Manufacturers

**IN THE UNITED STATES DISTRICT COURT FOR THE
 EASTERN DISTRICT OF CALIFORNIA**

CENTRAL VALLEY CHRYSLER-JEEP,
 INC., et al,

Plaintiffs,

v.

JAMES GOLDSTENE, in his official
 capacity as Executive Officer of the
 California Air Resources Board,

Defendant,

THE ASSOCIATION OF
 INTERNATIONAL AUTOMOBILE
 MANUFACTURERS,

Plaintiff-Intervenor,

SIERRA CLUB, NATURAL
 RESOURCES DEFENSE COUNCIL,
 ENVIRONMENTAL DEFENSE,
 BLUEWATER NETWORK, GLOBAL
 EXCHANGE and RAINFOREST ACTION
 NETWORK,

Defendant-Intervenors.

CASE NO. CIV-F-04-6663-AWI-GSA

STIPULATION AND ORDER FOR
 UNSEALING CERTAIN
 DEPOSITION TRANSCRIPTS

1 WHEREAS on November 8, 2006, the Association of International Automobile
2 Manufacturers ("AIAM") submitted an ex parte application seeking to file the following
3 documents under seal:

4 1. the declaration of Charles H. Haake in Support of the Motion of Plaintiff
5 Intervenor Association of International Automobile Manufacturers for Summary Judgment (ECF
6 419) and attached exhibits thereto including:

7 a. Exhibit C thereto: the lodged deposition of Charles Martin Shulock;

8 b. Exhibit D thereto: the lodged deposition of Paul Hughes; and

9 c. Exhibit E thereto: the lodged deposition of Steve Albu.

10 WHEREAS on November 13, 2006, this Court granted this motion and filed the
11 above-referenced documents under seal.

12 WHEREAS on November 13, 2006, AIAM submitted an ex parte application seeking to
13 file under seal other excerpts from the deposition of Steve Albu, which were attached as Exhibit
14 "C" to the Declaration of Charles H. Haake in Support of Plaintiff Intervenor the Association of
15 International Automobile Manufacturers' Opposition to Defendant and Defendant Intervenors'
16 Motion for Summary Judgment (Ripeness) (ECF 445).

17 WHEREAS on November 14, 2006, this Court granted this motion and filed the
18 above-referenced document under seal.

19 WHEREAS AIAM sought to file these materials under seal because these deposition
20 transcripts were designated "Highly Confidential" under this Court's protective order.

21 WHEREAS the parties have since determined that the above-referenced material does not
22 contain confidential or proprietary information and that these materials has become a matter of
23 public record in the Green Mountain Chrysler trial in the United States District Court for the
24 District of Vermont.

25 WHEREAS in light of the foregoing and the appellants' intention to include these
26 materials in the appellate record, the parties to this action stipulate, through their respective
27

1 attorneys of records, that the above-referenced depositions should be unsealed.

2 THEREFORE, IT IS STIPULATED AND AGREED that:

3 The following material should be unsealed and included in the district court's record in
4 this matter:

5 1. The declaration of Charles H. Haake in Support of the Motion of Plaintiff
6 Intervenor Association of International Automobile Manufacturers for Summary Judgment and
7 attached exhibits thereto (ECF 419) including

8 a. the lodged deposition of Charles Martin Shulock;

9 b. the lodged deposition of Paul Hughes;

10 c. the lodged deposition of Steve Albu;

11 2. Exhibit "C" to the Declaration of Charles H. Haake in Support of Plaintiff
12 Intervenor the Association of International Automobile Manufacturers' Opposition to Defendant
13 and Defendant Intervenor's Motion for Summary Judgment (Ripeness) (ECF 445).

14 DATED February 6, 2009

15 GIBSON, DUNN & CRUTCHER, LLP

16 By: /s/ Raymond B. Ludwischewski
Raymond B. Ludwischewski

17
18 Attorneys for Plaintiff-Intervenor,
Association of International Automobile Manufacturers

19 KIRKLAND & ELLIS LLP

20 By: /s/ Andrew B. Clubok (as authorized 2/4/2009)
Andrew B. Clubok
21 Attorney for all Plaintiffs

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26 ///

EDMUND G. BROWN JR.,
Attorney General of the State of California
SIERRA CLUB
NATURAL RESOURCES DEFENSE COUNCIL
ENVIRONMENTAL DEFENSE
BLUEWATER NETWORK
GLOBAL EXCHANGE
RAINFOREST ACTION NETWORK,

By: /s/ Kathleen A. Kenealy (as authorized 2/6/2009)
Kathleen A. Kenealy
On Behalf of Defendant and Defendant-Intervenors

ORDER

IT IS SO ORDERED.

Dated: February 6, 2009

/s/ Anthony W. Ishii
CHIEF UNITED STATES DISTRICT JUDGE