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11	Delense Council, and San Francisco Baykeep	<i>ler</i>	
12	[Additional Counsel on Signature Page]		
13	IN THE UNITED STATES DISTRICT COURT		
14	FOR THE EASTERN DISTRIC	T OF CALIFORNIA	
15		07-CV-2320 GEB GGH	
16		OINT STIPULATION AND PROPOSED] ORDER EXTENDING	
17	CALIFORNIA REGIONAL WATER	EADLINE FOR MOTION FOR TTORNEYS' FEES	
18	QUALITY CUNTRUL BUARD, SAN	udge: Hon. Garland E. Burrell, Jr.	
19	Plaintiff- Intervenor	augo iron. Gariana B. Barron, or.	
20	v.		
21	UNITED STATES MARITIME ADMINISTRATION, et al.,		
22	Defendants.		
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	Joint Stipulation and [Proposed] Order Extending	Deadline for Mot. for Att'ys' Fees, No. 2:07-CV-	
		2320 GEB GGH	

WHEREAS on April 14, 2010, the Court entered a consent decree in this litigation that eliminates the need for a trial on remedy and designates all Plaintiffs as "prevailing parties" within the meaning of 33 U.S.C. § 1365(d), and Environmental Plaintiffs as "prevailing parties" within the meaning of 42 U.S.C. § 6972(e); and

WHEREAS the proposed consent decree states that the parties will attempt to resolve any claims to attorneys' fees through negotiation; and

WHEREAS on April 14, 2010, and again on May 26, 2010, pursuant to stipulations by the parties, the Court extended the deadline for all Plaintiffs to file a bill of costs and a motion for attorneys' fees to facilitate the parties' attempt to resolve any claims to attorneys' fees and costs through negotiation;

WHEREAS, the current extension of time to file a bill of costs and a motion for attorneys' fees will run on July 28, 2010;

WHEREAS the Environmental Plaintiffs and Defendants have reached a tentative settlement agreement on the matter of attorneys' fees and costs subject to required governmental review and approval processes, and believe that additional time is necessary to complete these review and approval processes;

THEREFORE, Environmental Plaintiffs and Defendants stipulate and agree that Environmental Plaintiffs shall have until August 25, 2010 to file a bill of costs under Civil Local Rule 54-292 and to file a motion for attorneys' fees under Civil Local Rule 54-293 and Federal Rule of Civil Procedure 54(d)(2)(B), and request that the Court grant such extension.

Respectfully submitted,

For Plaintiffs

Dated: July 15, 2010 /s/ <u>Jonathan Wiener</u> JONATHAN WIENER (SBN 265006)

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8		
9	Pursuant to the stipulation of the parties, IT IS SO ORDERED.	
10	DATED: July 15, 2010	
11 12	GABLAND E. BURRELL, JR.	
13	United States District Judge	
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1 CERTIFICATE OF SERVICE 23 I hereby certify that on July 15, 2010, I electronically transmitted the 4 foregoing Joint Stipulation and [Proposed] Order Extending Deadline for 5 Motion for Attorneys' Fees to the Clerk's Office using the CM/ECF System for 6 filing and transmittal of a Notice of Electronic Filing to the following CM/ECF 7 registrants: 8 9 Leslie M. Hill Leslie.Hill@usdoj.gov 10 Michelle R. Lambert 11 Michelle.Lambert@usdoj.gov 12 Tara L. Mueller 13 tara.mueller@doj.ca.gov 14 Christiana Tiedemann 15 chris.tiedemann@doj.ca.gov 16 Michael Wall mwall@nrdc.org 17 18 Thomas Cmar tcmar@nrdc.org 19 Scott Allen 20 sallen@lgpatlaw.com 21 David A. Nicholas 22 dnicholas@verizon.net 23 24 2526 27 28