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28	PLAINTIFFS' AND FEDERAL DEFENDANTS'	Case No. 2:09-cv-2523-LKK-JFM
	STIPULATION AND [PROPOSED] ORDER	Cuse 110. 2.07-07-2323-LIXIX-J110
	REGARDING THE DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS	
		Dockets.Justi

1 2	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA				
3 4	CENTER FOR SIERRA NEVADA CONSERVATION, CENTER FOR BIOLOGICAL DIVERSITY, and FOREST ISSUES GROUP, non-profit corporations, Plaintiffs,	Case No. 2:09-cv-2523-LKK-JFM PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND ORDER			
6	vs.	REGARDING THE DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS			
7 8 9	RAMIRO VILLALVAZO, in his official capacity as Forest Supervisor for the Eldorado National Forest, UNITED STATES FOREST SERVICE,				
10	Defendants, and				
11 12	CALIFORNIA ASSOC. OF 4 WHEEL DRIVE CLUBS, <i>et al.</i> ,				
13 14	Defendant-Intervenors.				
15	Whereas by order dated February 28, 2013, the Court stayed briefing on Plaintiffs' petition for				
16	costs and attorney fees until April 26, 2013, by which time the Parties were to advise the Court on the				
17 18	status of the their settlement discussions. Dkt. No. 134;				
19	Whereas Plaintiffs and Federal Defendants have engaged in substantive good-faith discussions				
20	attempting to negotiate a settlement of the issue of c	costs and attorney fees;			
21	Whereas on April 16, 2013, Plaintiffs and Federal Defendants reached an agreement in principle				
22	on Plaintiffs' claim for costs and attorney fees;				
23 24	Whereas this agreement is subject to the review and approval by the appropriate supervisory				
24	officials at the Department of Justice and Department of Agriculture;				
26	Whereas the Federal Defendants estimate that it will take approximately ninety (90) days to				
27	perform the review and approval of the agreement in principle;				
28	PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND [PROPOSED] ORDER REGARDING THE DEADLINE FOR MOTION	2 Case No. 2:09-cv-2523-LKK-JFM			

FOR ATTORNEYS' FEES AND COSTS

FOR ATTORNEYS' FEES AND COSTS

Whereas Defendant-Intervenors have not participated in the negotiations, and thus have not formed a position but have been consulted regarding this stipulation and do not oppose any request that the primary parties continue negotiations;

Accordingly, Plaintiffs and Federal Defendants stipulate and agree, and request that the Court enter an order staying until July 25, 2013, the deadline for Plaintiffs to file a motion for attorneys' fees, costs, and other expenses. If no agreement appears forthcoming, the Parties will submit a proposed schedule for briefing the fee petition. By entering into this Stipulation, Federal Defendants do not waive any defenses as to whether Plaintiffs are entitled to any attorneys' fees, costs or expenses in this case. Respectfully submitted on April 23, 2013.

> IGNACIA S. MORENO Assistant Attorney General Environment and Natural Resources Division

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-	PLAINTIFFS' AND FEDERAL DEFENDANTS'	3	Case No. 2:09-cv-2523-LKK-J	FM
	STIPULATION AND [PROPOSED] ORDER	5		
	REGARDING THE DEADLINE FOR MOTION			

1	ORDER		
2	This matter having come before the Court upon Plaintiffs' and Federal Defendants' stipulation		
3	and proposed order regarding the deadline for motion for attorneys' fees and costs, and the Court being		
4	fully advised in the premises and good cause appearing;		
6	IT IS HEREBY ORDERED that briefing on Plaintiffs' application for fees and costs is stayed		
7	until July 25, 2013. If no agreement appears forthcoming, the Parties will submit a proposed schedule		
8	for briefing the fee petition.		
9	Dated this 25th of April, 2013.		
10			
11	Jaimme K Karlton		
12	LAWRENCE K. KARLTON SENIOR JUDGE		
13	UNITED STATES DISTRICT COURT		
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28	PLAINTIFFS' AND FEDERAL DEFENDANTS' Case No. 2:09-cy-2523-LKK-IFM		
	PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND [PROPOSED] ORDER REGARDING THE DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS		