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	PLAINTIFFS' AND FEDERAL DEFENDANTS'	Case No. 2:09-cv-2523-LKK-JFM
	STIPULATION AND [PROPOSED] ORDER	
	FOR ATTORNEYS' FEES AND COSTS	Dockets.Justi

1	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA		
2	FOR THE EASTERN DIS	STRICT OF CALIFORNIA	
3	CENTER FOR SIERRA NEVADA CONSERVATION, CENTER FOR BIOLOGICAL	Case No. 2:09-cv-2523-LKK-JFM	
4	DIVERSITY, and FOREST ISSUES GROUP,		
5	non-profit corporations,	PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND ORDER	
6	Plaintiffs,	REGARDING THE DEADLINE FOR MOTION	
7	VS.	FOR ATTORNEYS' FEES AND COSTS	
	RAMIRO VILLALVAZO, in his official capacity		
8	as Forest Supervisor for the Eldorado National Forest, UNITED STATES FOREST SERVICE,		
9			
10	Defendants, and		
11	CALIFORNIA ASSOC. OF 4 WHEEL DRIVE		
12	CLUBS, et al.,		
13	Defendant-Intervenors.		
14			
15	Whereas by order dated April 26, 2013, the Court stayed briefing on Plaintiffs' petition for costs		
16 17	and attorney fees until July 25, 2013, by which time the Parties were to advise the Court on the status of		
17	the their settlement discussions. Dkt. No. 136;		
19	Whereas Plaintiffs and Federal Defendants h	nave engaged in substantive good-faith discussions	
20	attempting to negotiate a settlement of the issue of c	costs and attorney fees;	
21	Whereas Plaintiffs and Federal Defendants have identified terms for an agreement in principle		
22	that resolves Plaintiffs' claim for costs and attorney fees and drafted a proposed agreement;		
23 24	Whereas the proposed agreement remains su	bject to the review and approval by the appropriate	
25	supervisory officials at the Department of Justice and Department of Agriculture;		
26	Whereas the Federal Defendants estimate that it will take approximately six additional weeks to		
27	complete the review and gain approval of the proposed agreement by the appropriate supervisory		
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

officials at the Department of Justice and Department of Agriculture;

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 September 5, 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 July 25, 2013.

> ROBERT G. DREHER Acting Assistant Attorney General Environment and Natural Resources Division

5	<u></u>	/s/ John P. Tustin
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	PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND [PROPOSED] ORDER REGARDING THE DEADLINE FOR MOTION	3 Case No. 2:09-cv-2523-LKK-JFM

FOR ATTORNEYS' FEES AND COSTS

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;		
5	IT IS HEREBY ORDERED that briefing on Plaintiffs' application for fees and costs is stayed		
6	until September 5, 2013. If no agreement appears forthcoming, the Parties will submit a proposed		
7			
8	schedule for briefing the fee petition.		
9	Dated this 26th of July, 2013.		
10	,		
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12	LAWRENCE K. KARLTON SENIOR JUDGE UNITED STATES DISTRICT COURT		
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	PLAINTIFFS' AND FEDERAL DEFENDANTS' STIPULATION AND [PROPOSED] ORDER REGARDING THE DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS4Case No. 2:09-cv-2523-LKK-JFM		