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Attorneys for Defendant-Intervenor Applicants,  
 SAFARI CLUB INTERNATIONAL;  
 SAFARI CLUB INTERNATIONAL FOUNDATION,

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

IN DEFENSE OF ANIMALS;  
 DREAMCATCHER WILD HORSE AND  
 BURRO SANCTUARY; BARBARA CLARKE;  
 CHAD HANSON; LINDA HAY,

Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF THE  
 INTERIOR; BUREAU OF LAND  
 MANAGEMENT; KEN SALAZAR, Secretary of  
 the United States Department of the Interior;  
 ROBERT ABBEY, Director of the Bureau of  
 Land Management; DAYNE BARRON, Field  
 Manager of Eagle Lake Field Office,

Defendants.

SAFARI CLUB INTERNATIONAL; SAFARI  
 CLUB INTERNATIONAL FOUNDATION,

Defendant-Intervenor Applicants.

Case No.: 2:10-cv-01852-MCE-DAD

**JOINT STIPULATION TO SUBMIT  
 MOTION TO INTERVENE WITHOUT A  
 HEARING AND SET BRIEFING  
 SCHEDULE FOR MOTION TO  
 INTERVENE; ORDER**

Hearing Date: Currently set: February 10,  
 2011

Time: 2:00 p.m.

Courtroom: 7

Honorable Morrison C. England, Jr.

Action Filed: July 15, 2010

1 The Plaintiffs and Defendant-Intervenor Applicants SAFARI CLUB INTERNATIONAL  
2 and SAFARI CLUB INTERNATIONAL FOUNDATION ("Safari Club") jointly move to submit  
3 Safari Club's motion to intervene (Dkt. 72-75, filed January 10, 2011) without a hearing and to set  
4 the following briefing schedule:

5 Opposition to Motion to Intervene: February 10, 2011.

6 Reply to Opposition to Motion to Intervene: February 17, 2011.

7 Safari Club and Plaintiffs believe that the briefing to be submitted in support and in  
8 opposition to Safari-Club's motion to intervene will provide sufficient basis for this Court to  
9 resolve this matter. See Local Rule 230(g). The revised briefing schedule is designed to  
10 accommodate the schedules of counsel while still disposing of this motion in a timely fashion so  
11 that all parties to this action can be identified before this case proceeds.

12 Federal Defendants take no position on Safari Club's motion to intervene and are therefore  
13 not a party to this stipulation, however they have represented that they have no objection to the  
14 matters being proposed herein.

15 For the reasons stated in this Stipulation, the Plaintiffs and Safari Club respectfully request  
16 that the Court (1) cancel the hearing on the motion to intervene, currently scheduled for February  
17 10, 2011, and decide the motion on the papers; and (2) set the above briefing schedule.

18 Dated: January 24, 2011

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

19 By: /s/ Francis Torrence

20 FRANCIS TORRENCE  
21 Attorneys for Defendant-Intervenor Applicants,  
22 SAFARI CLUB INTERNATIONAL and SAFARI  
23 CLUB INTERNATIONAL FOUNDATION

24 Dated: January 24, 2011

SAFARI CLUB INTERNATIONAL

25 By: /s/ Douglas S. Burdin

26 DOUGLAS S. BURDIN (D.C. BAR NO.: 434107)  
27 (*Admitted Pro Hac Vice*)  
28 Attorneys for Defendant-Intervenor Applicants,  
SAFARI CLUB INTERNATIONAL and SAFARI  
CLUB INTERNATIONAL FOUNDATION

JOINT STIPULATION TO SUBMIT MOTION TO INTERVENE WITHOUT A HEARING AND SET BRIEFING  
SCHEDULE FOR MOTION TO INTERVENE; AND [PROPOSED] ORDER

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Case No.: 2:10-cv-01852-MCE-DAD

1 Dated: January 24, 2011

/s/ Rachel M. Fazio  
RACHEL M. FAZIO  
Attorney for Plaintiffs,  
IN DEFENSE OF ANIMALS; DREAMCATCHER  
WILD HORSE AND BURRO SANCTUARY;  
BARBARA CLARK; CHAD HANSON; AND  
LINDA HAY

7 **ORDER**


9 PURSUANT TO STIPULATION, IT IS ORDERED that the February 10, 2010 hearing on  
10 Safari Club's motion to intervene is taken off calendar. The Court will decide the motion to  
11 intervene on the papers.

12 IT IS FURTHER ORDERED, that the briefing schedule shall be as follows:

13 Opposition to Motion to Intervene: February 10, 2011.

14 Reply to Opposition to Motion to Intervene: February 17, 2011.

15 DATED: January 29, 2011

16   
17 MORRISON C. ENGLAND, JR.  
18 UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

*In Defense of Animals, et al. v. United States Department of the Interior, et al.  
U.S.D.C., Eastern District of California, Case No.: 2:10-cv-01852-MCE-DAD*

At the time of service I was over 18 years of age and not a party to this action. I am employed by WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP. My business address is 525 Market Street, 17<sup>th</sup> Floor, San Francisco, California 94105. My business telephone number is (415) 433-0990; my business fax number is (415) 434-1370. On this date I served the following document(s):

**JOINT STIPULATION TO SUBMIT MOTION TO INTERVENE WITHOUT A  
HEARING AND SET BRIEFING SCHEDULE FOR MOTION TO INTERVENE; AND  
[PROPOSED] ORDER**

on the person or persons listed below, through their respective attorneys of record in this action, by placing true copies thereof in sealed envelopes or packages addressed as shown below by the following means of service:

☒: **By Electronic Service.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

*See Attached Service List*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

EXECUTED on January 31, 2011, at San Francisco, California.

\_\_\_\_\_  
Marissa Y. Otellini

**SERVICE LIST**

*In Defense of Animals, et al. v. United States Department of the Interior, et al.  
U.S.D.C., Eastern District of California, Case No.: 2:10-cv-01852-MCE-DAD*

<p>Rachel M. Fazio, Esq. Attorney at Law P.O. Box 697 Cedar Ridge, CA 95924 Telephone: (530) 273-9290 Email: <a href="mailto:rfazio@nccn.net">rfazio@nccn.net</a> <b><i>Attorney for Plaintiffs, In Defense of Animals; Dreamcatcher Wild Horse and Burro Sanctuary; Barbara Clark; Chad Hanson; and Linda Hay</i></b></p>	<p>Ayako Sato, Esq. Erik E. Peterson, Esq. U.S. Department of Justice Ben Franklin Station P.O. Box 663 Washington, D.C. 20044 Telephone: (202) 305-0239 Facsimile: (202) 305-0506 Email: <a href="mailto:ayako.sato@usdoj.gov">ayako.sato@usdoj.gov</a> <a href="mailto:erik.peterson@usdoj.gov">erik.peterson@usdoj.gov</a> <b><i>Attorneys for Defendants, United States Department of the Interior; Bureau of Land Management; Ken Salazar, Secretary of the United States Department of the Interior; Robert Abbey, Director of Bureau of Land Management; and Dayne Barron, Field Manager of Eagle Lake Field Office</i></b></p>
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