

1 IGNACIA S. MORENO  
Assistant Attorney General  
2 Environment & Natural Resources Division  
United States Department of Justice

3 PETER WHITFIELD (HI 08749)  
4 Natural Resources Section  
P.O. Box 663  
5 Washington, D.C. 20044-0663  
TEL: (202) 305-0430  
6 FAX: (202) 305-0267  
e-mail: peter.whitfield@usdoj.gov

7 DAVID B. GLAZER (D.C. 400966)  
8 Natural Resources Section  
301 Howard Street, Suite 1050  
9 San Francisco, California 94105  
TEL: (415) 744-6491  
10 FAX: (415) 744-6476  
e-mail: david.glazer@usdoj.gov

11 ADAM J. KATZ (D.C. 502776)  
12 Environmental Defense Section  
P.O. Box 23986  
13 Washington, D.C. 20026-3986  
TEL: (202) 514-2689  
14 FAX: (202) 514-8865  
e-mail: adam.katz@usdoj.gov

15 Attorneys for Federal Defendant

16 UNITED STATES DISTRICT COURT  
17 FOR THE EASTERN DISTRICT OF CALIFORNIA  
18 SACRAMENTO DIVISION

19 KLAMATH-SISKIYOU WILDLANDS  
20 CENTER, ENVIRONMENTAL PROTECTION  
INFORMATION CENTER, KLAMATH  
21 FOREST ALLIANCE, THE WILDERNESS  
SOCIETY, and WILDLANDS CPR,

22 Plaintiffs,

23 v.

24 PATRICIA A. GRANTHAM, Klamath National  
25 Forest Supervisor; and UNITED STATES  
FOREST SERVICE,

26 Defendants.  
27

No. 2:11-cv-00439-MCE-JFM

PLAINTIFFS AND FEDERAL DEFENDANTS'  
STIPULATION AND ORDER SETTING DATE  
FOR RESPONSE TO COMPLAINT,  
BRIEFING SCHEDULE, AND PAGE LIMITS

Date: N/A  
Time: N/A  
Courtroom No. 7  
Hon. Morrison C. England, Jr.

28 *Klamath-Siskiyou Wildlands Ctr., et al. v. Grantham, et al.*, No. 2:11-cv-00439-MCE-JFM  
Stipulation and Proposed Order Setting Date for Response to Complaint, Briefing Schedule and Page Limits

1 Federal Defendants Patricia A. Grantham and the U.S. Forest Service and Plaintiffs Klamath-  
2 Siskiyou Wildlands Center, Environmental Protection Information Center, Klamath Forest Alliance, The  
3 Wilderness Society, and Wildlands CPR (the “Parties”) hereby stipulate, subject to Court approval  
4 pursuant to Civil L.R. 144, that dates for the Federal Defendants’ response to the Complaint in this case  
5 and for briefing cross-motions for summary judgment, together with page limits governing briefing on  
6 those motions, be set as provided below.<sup>1</sup>

7 In support of this Stipulation, the parties represent as follows:

- 8 1. Plaintiffs filed their Complaint on February 16, 2011, and served it on February 18, 2011.
- 9 2. The Federal Defendants’ response to the Complaint is currently due on April 19, 2011.
- 10 3. The Parties have conferred and have agreed upon the following, subject to Court  
11 approval:

12 May 17, 2011: Federal Defendants will respond to the Complaint.

13 July 29, 2011: Federal Defendants will file the Administrative Record.

14 August 31, 2011: Plaintiffs will file a motion to address any issues concerning the  
15 Administrative Record that the Parties have not been able to resolve  
16 informally.

17 September 16, 2011: Plaintiffs will file their opening summary judgment papers.

18 October 14, 2011: Federal Defendants will file their combined responsive papers and cross-  
19 motion.

20 November 7, 2011: Plaintiffs will file their reply memorandum.

21 December 5, 2011: Federal Defendants will file their reply memorandum.

22 Page limits will be 30 pages for the Plaintiffs’ opening memorandum and for the Federal Defendants’  
23 memorandum in support of their response and cross-motion, and 20 pages for Plaintiffs’ and the Federal  
24 Defendants’ reply memoranda.

---

25  
26 <sup>1</sup> In accordance with Paragraph 4 of the Court’s February 17, 2011 Order Requiring Joint Status Report  
27 [Dkt. #5], the Parties will be filing a Joint Status Report providing the information about this case  
required by the Court’s Order.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SO STIPULATED:

DATED: April 8, 2011

FOR THE PLAINTIFFS

/s/ Susan Jane M. Brown  
(as authorized on April 1, 2011)  
SUSAN JANE M. BROWN  
Western Environmental Law Center  
4107 N.E. Couch Street  
Portland, Oregon 97232  
Tel: (503)-914-1323  
Fax: (541) 485-2475  
E-mail: brown@westernlaw.org

DATED: April 8, 2011

FOR THE FEDERAL DEFENDANTS

IGNACIA S. MORENO  
Assistant Attorney General  
Environment & Natural Resources Division  
United States Department of Justice  
  
By: /s/ Adam J. Katz  
ADAM J. KATZ  
Environmental Defense Section  
PETER WHITFIELD  
DAVID B. GLAZER  
Natural Resources Section

ORDER

In consideration of the foregoing Stipulation, good cause having been shown, it is hereby ORDERED that the Stipulation is APPROVED. It is further ORDERED that the following dates and requirements are set:

May 17, 2011: Federal Defendants will respond to the Complaint.

July 29, 2011: Federal Defendants will file the Administrative Record.

August 31, 2011: Plaintiffs will file a motion to address any issues concerning the Administrative Record that the Parties have not been able to resolve informally.

September 16, 2011: Plaintiffs will file their opening summary judgment papers.

October 14, 2011: Federal Defendants will file their combined responsive papers and cross-motion.


November 7, 2011: Plaintiffs will file their reply memorandum.

December 5, 2011: Federal Defendants will file their reply memorandum.

Page limits will be 30 pages for the Plaintiffs' opening memorandum and for the Federal Defendants' memorandum in support of their response and cross-motion, and 20 pages for Plaintiffs' and the Federal Defendants' reply memoranda.

SO ORDERED.

**Date: April 8, 2011**

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE