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13 **IN THE UNITED STATES DISTRICT COURT**  
14 **EASTERN DISTRICT OF CALIFORNIA**

15 CONSERVATION CONGRESS, a nonprofit  
16 organization,

17 Plaintiff,

18 v.

19 UNITED STATES FOREST SERVICE;  
20 UNITED STATES FISH AND WILDLIFE  
21 SERVICE,

22 Defendants

23 CASE NO. 13-cv-01922-TLN-CMK

24 **JOINT STIPULATED MOTION AND  
25 ORDER TO CONTINUE PRETRIAL  
26 DATES**

27 Plaintiff challenges the Bagley Hazard Tree Abatement project in the Shasta-Trinity National  
28 Forest. The challenged decision was adopted on August 29, 2013, Plaintiff served its Complaint on  
September 26, 2013, and the United States filed a motion to dismiss on January 9, 2014. (See Dkt. Nos.  
1 & 15. The Court denied the United States' motion to dismiss on November 19, 2014, and set a  
briefing schedule on December 10, 2014, after receiving input from the parties. (See Dkt. Nos. 25-27).  
The administrative record is currently due by February 2, 2015, and Plaintiff's opening brief is due  
March 3, 2015.

29 Since the Court set the briefing schedule, the parties have identified a significant opportunity for  
30 resolution, and wish to pursue it. Given the pending litigation deadlines and the process required for  
31 consummation of any potential settlement, however, it is not realistic to pursue litigation and resolution  
32 simultaneously. Therefore, the parties stipulate and jointly request a 120-day continuation of all dates so  
33 that they may pursue resolution without further burden on this Court. The parties thus propose the  
34 **STIPULATION AND ORDER TO CONTINUE PRETRIAL DATES**

1 following schedule:

Event	Current Date	Proposed Date
Administrative Record Lodged	February 2, 2015	June 1, 2015
Objections to Administrative Record	February 23, 2015	June 22, 2015
Plaintiff's Motion	March 3, 2015	June 29, 2015
Defendants' Opposition and Cross-motion	April 3, 2015	July 31, 2015
Plaintiff's Combined Opposition and Rep	April 17, 2015	August 14, 2015
Defendants' Reply	May 1, 2015	August 31, 2015

11  
12 Respectfully submitted,

13 DATED: January 26, 2015

14 By /s/ Sean Malone  
15 Attorney for Plaintiff

16 BENJAMIN B. WAGNER  
17 United States Attorney

18 By: /s/ Gregory T. Broderick  
19 GREGORY T. BRODERICK  
20 Assistant United States Attorney

## **PROPOSED ORDER**

IT IS SO ORDERED.

Dated: January 30, 2015

  
Troy L. Nunley  
United States District Judge