

BENJAMIN B. WAGNER
United States Attorney
GREGORY T. BRODERICK
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Defendants

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

CONSERVATION CONGRESS, a nonprofit
organization,

Plaintiff,

v.

UNITED STATES FOREST SERVICE;
UNITED STATES FISH AND WILDLIFE
SERVICE,

Defendants

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

**JOINT STIPULATED MOTION AND
ORDER TO CONTINUE PRETRIAL
DATES**

Plaintiff challenges the Bagley Hazard Tree Abatement project in the Shasta-Trinity National 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.

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

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

Respectfully submitted,

DATED: January 26, 2015

By /s/ Sean Malone
Attorney for Plaintiff

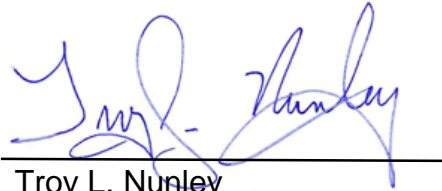
BENJAMIN B. WAGNER
United States Attorney

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

PROPOSED ORDER

IT IS SO ORDERED.

Dated: January 30, 2015



Troy L. Nunley
United States District Judge