```
Rachel Fazio (CA Bar # 187580)
 1
     PO Box 697
2
     Cedar Ridge, CA 95924
     Tel: (530) 273-9290
 3
     Fax: (530) 273-9260
 4
     rachelmfazio@gmail.com
5
     Sean Malone (OR Bar # 084060) (Pro Hac Vice)
6
     259 E.5th Ave, Ste200-G
     Eugene, OR 97401
 7
     Tel: (303) 859-0403
8
    Fax: (650) 471-7366
     seanmalone8@hotmail.com
9
10
     Elisabeth Holmes (OR Bar # 120254) (Pro Hac Vice)
     Blue River Law, P.C.
11
     P.O. Box 293
12
     Eugene, OR 97440
     Tel. (541) 870-7722
13
     eli.blueriverlaw@gmail.com
14
     Attorneys for Plaintiff
15
16
                    IN THE UNITED STATES DISTRICT COURT
17
                  FOR THE EASTERN DISTRICT OF CALIFORNIA
18
     CONSERVATION CONGRESS, a
19
     non-profit organization,
                                        ) Case No.: 13-cv-01922-TLN-CMK
20
          Plaintiff,
                                          JOINT STIPULATED AND ORDER
21
                                          TO SUSPEND CASE DEADLINES
          VS.
22
     UNITED STATES FOREST
23
     SERVICE, UNITED STATES
24
     FISH AND WILDLIFE SERVICE,
          Defendants.
25
      JOINT STIPULATION & ORDER TO SUSPEND CASE DEADLINES
```

In this matter, the Plaintiff challenges the Bagley Hazard Tree Abatement Project, located in the Shasta-Trinity National Forest. Defendant U.S. Forest Service filed its Administrative Record (AR) on June 8, 2015. ECF No. 31. Defendant U.S. Fish & Wildlife Service filed its AR on November 16, 2015. ECF No. 38.

The parties have met and conferred on Plaintiffs' objections to Defendants' Administrative Records. Plaintiff intends to file a Motion to Supplement the Record on December 21, 2015. Defendant intends to file a response to Plaintiff's motion on January 11, 2015. Plaintiff intends to file its reply on January 18, 2015. The parties agree that oral argument is unnecessary for Plaintiff's motion to supplement the record, and thus do not request argument. Because this matter must be settled prior to submitting the parties' Cross-Motions for Summary Judgment, the parties respectfully request that this court suspend the existing case deadlines. Upon resolution of Plaintiff's motion to supplement the record, the parties will confer and stipulate to further deadlines.

Respectfully submitted,

DATED: December 17, 2015

/s/ Rachel Fazio RACHEL FAZIO

<u>/s/ Sean T. Malone</u> SEAN T. MALONE

<u>/s/ Elisabeth A. Holmes</u> ELISABETH A. HOLMES

Attorneys for Plaintiff

DATED: December 17, 2015	BENJAMIN B. WAGNER
	United States Attorney
	By: /s/ Gregory T. Broderick GREGORY T. BRODERICK
	Assistant United States Attorney
	DATED: December 17, 2015

## <u>ORDER</u> The Parties' Joint Stipulated Motion to suspend existing case deadlines to allow for resolution of Plaintiff's Motion to Supplement the Record is hereby ALLOWED. Dated: December 18, 2015 Troy L. Nunley United States District Judge