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**IN THE DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

26 SAFARI CLUB INTERNATIONAL) 2:14-cv-01856-GEB-AC
27)
28 Plaintiff,)
29)
30 v.)

31 KAMALA D. HARRIS, in her official)
32 capacity as the Attorney General of)
33 California; CHARLTON H. BONHAM,)
34 in his official capacity as the Director of)
35 the California Department of Fish and)
36 Wildlife,)
37)
38 Defendants.)

**STIPULATION RE
CHANGING SCHEDULING
CONFERENCE AND JOINT
STATUS REPORT DATES**

Courtroom: 10, 13th Floor
Judge: Hon. Garland E. Burrell, Jr.
Action Filed: August 6, 2014

1 Plaintiff Safari Club International (“Safari Club”) and Defendants Attorney General
2 Kamala D. Harris and Director Charlton H. Bonham (“Defendants,” and collectively with Safari
3 Club, the “Parties”), by and through their respective counsel, jointly submit for approval this
4 stipulation regarding the rescheduling of the pretrial scheduling conference (currently set for
5 June 22, 2015) and joint status report (currently due June 8, 2015). In support, the Parties state
6 the following:

7 WHEREAS, on August 6, 2014, Safari Club filed its Complaint for Declaratory and
8 Injunctive Relief;

9 WHEREAS by Order dated April 29, 2015 this Court granted Defendants’ Motion to
10 Dismiss Safari Club’s Complaint and granted Safari Club fourteen (14) days to file a First
11 Amended Complaint (ECF No. 37);

12 WHEREAS, on May 13, 2015, Safari Club filed its First Amended Complaint for
13 Declaratory and Injunctive Relief (ECF No. 38);

14 WHEREAS by stipulation of the Parties, Defendants’ last day to answer or otherwise
15 respond to Safari Club’s First Amended Complaint is June 17, 2015 (ECF No. 39);

16 WHEREAS Defendants anticipate filing a motion to dismiss noticed for hearing on
17 September 14, 2015, or the earliest date thereafter that is convenient for the Court;

18 WHEREAS by stipulation of the Parties and Order of this Court, there currently is a
19 status conference set for June 22, 2015, and a joint status report due on June 8, 2015 (ECF No.
20 34);

21 WHEREAS, due to Defendants’ anticipated motion to dismiss Safari Club’s First
22 Amended Complaint, the Parties believe that the preparation of a joint status report by June 8,
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1 2015, and holding of a pretrial scheduling conference on June 22, 2015, are premature and, in the
2 interests of efficiency and conservation of judicial and party resources, should be postponed until
3 after the Court has resolved the motion to dismiss.

4 THEREFORE, in consideration of the foregoing, the Parties respectfully request approval
5 of this stipulation to grant the following relief:

6 The preparation of the joint status report be rescheduled to November 16, 2015, and the
7 June 22, 2015 pretrial scheduling conference be rescheduled to November 30, 2015, or the
8 earliest dates thereafter that are convenient for the Court.

9 Dated this 28th day of May, 2015.

10
11 Respectfully submitted,

12 */s/ Douglas S. Burdin*
13 DOUGLAS S. BURDIN
14 SAFARI CLUB INTERNATIONAL
15 (D.C. Bar No. 434107)
16 Pro hac vice granted
17 *Attorney for Plaintiff Safari Club*
18 *International*

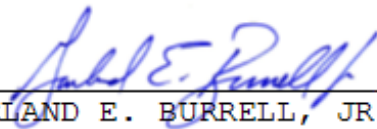
19 KAMALA D. HARRIS
20 Attorney General of California
21 TAMAR PACHTER
22 Supervising Deputy Attorney General

23 */s/ Alexandra Robert Gordon*
24 ALEXANDRA ROBERT GORDON
25 Deputy Attorney General
Attorneys for Defendants Attorney General
Harris & Director Bonham

1 HAVING CONSIDERED THE STIPULATION OF THE PARTIES, AND GOOD CAUSE
2 APPEARING, **IT IS SO ORDERED:**

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4 The pretrial scheduling conference is rescheduled for December 7, 2015, at 9:00
5 a.m. A joint status report shall be filed fourteen days prior to the hearing.

6 **Dated: May 29, 2015**

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11 GARIAND E. BURRELL, JR.
12 Senior United States District Judge
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