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21 Attorneys for Plastic Pollution Coalition,  
22 a project of Plaintiff Earth Island Institute

23  
24 **UNITED STATES DISTRICT COURT**  
25 **EASTERN DISTRICT OF CALIFORNIA**

26 PLASTIC POLLUTION COALITION, a  
27 project of EARTH ISLAND INSTITUTE, a  
28 non-profit organization,

Plaintiff,

vs.

AMCOR RIGID PLASTICS USA, INC., and  
AMCOR RIGID PLASTICS USA, LLC,

Defendants.

**Case No. 2:15-CV-00614-WBS-KJN**

**PARTIES' STIPULATION TO ENTRY  
OF CONSENT JUDGMENT AND  
[PROPOSED] ORDER**

Complaint Served: April 16, 2015  
Judge: Hon. William B. Shubb

*(Federal Water Pollution Control Act, 33  
U.S.C. §§ 1251, et seq.)*

1 WHEREAS, on March 24, 2016, the Parties lodged with this Court a proposed Consent  
2 Decree, signed by each (Dkt. 13-1) and simultaneously submitted the same to the U.S.  
3 Department of Justice pursuant to the requirements of the Clean Water Act, 33, U.S.C. §  
4 1365(c)(3);

5 WHEREAS, on May 4, 2016, the U.S. Department of Justice filed with this Court a letter  
6 stating that “the United States has no objection the proposed consent decree;” (Dkt. 15)

7 WHEREAS, the [Proposed] Consent Decree lodged with this Court lacked a signature  
8 line for entry by this Court, which is the desired outcome of this case of each of the Parties;

9 THEREFORE: Counsel hereby stipulate to entry of the proposed Consent Decree by this  
10 Court on behalf of their respective clients, each of which signed and agreed to be bound by the  
11 terms of the [Proposed] Consent Decree prior to it being filed with this Court and reviewed by  
12 the U.S. Department of Justice.

13 Dated: May 23, 2016

GREENFIRE LAW

14  
15 By:     /s/ Rachel S. Doughty      
16 Rachel S. Doughty  
17 James M. Birkelund  
18 Gary Davis  
19 Attorneys for Plaintiff  
20 PLASTIC POLLUTION COALITION

21 Dated: May 23 , 2016

CASTELLÓN & FUNDERBURK, LLP

22 By:     /s/ Ruben A.Castellon      
23 Ruben A. Castellon  
24 Anna L. Le May  
25 Attorneys for Defendants  
26 AMCOR RIGID PLASTICS USA, INC.  
27 and AMCOR RIGID PLASTICS USA,  
28 LLC

All other signatories listed, and on whose behalf this filing is submitted, concur in the  
filing’s content and have authorized the filing.

    /s/ Rachel S. Doughty      
Rachel S. Doughty

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**ORDER OF ENTRY OF CONSENT DECREE**


IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

The proposed Consent Decree lodged as docket entry 13-1, is adopted by this Court and by this Order shall be entered.

In accordance with the Consent Decree, all claims in the complaint are conditionally dismissed under Federal Rule of Civil Procedure 41(a)(2), with the Court retaining jurisdiction to enforce the Consent Decree. As the Consent Decree fully resolves this case, the Clerk of the Court is ordered to terminate this case.

APPROVED AND SO ORDERED.

Dated: May 24, 2016

  
\_\_\_\_\_  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE