



1 In accordance with the agreed scheduling proposal outlined in the Joint Status Report and  
2 Discovery Plan filed concurrently herewith, Plaintiff United States of America and Defendants  
3 State of California and California State Lands Commission (collectively, “the Parties”) hereby  
4 stipulate to a briefing schedule and hearing date pursuant to Local Rule 143. As explained in the  
5 Joint Status Report and Discovery Plan, the Parties believe that this case can and should be  
6 decided on cross-motions for summary judgment, that no trial will be needed, and that discovery  
7 and motion practice should be expedited to avoid the need for a motion for preliminary  
8 injunction.

9 Accordingly, the Parties further stipulate pursuant to Local Rule 143 to the following briefing  
10 schedule and hearing date for cross-motions for summary judgment:

- 11 - United States’ Motion for Summary Judgment: August 13, 2018
- 12 - Defendants’ Memorandum in Opposition/Cross-Motion: September 4, 2018
- 13 - United States’ Memorandum in Opposition/Reply Memorandum: September 24, 2018
- 14 - Defendants’ Reply Memorandum: October 1, 2018
- 15 - Hearing Date: October 15, 2018

16 In addition, the parties stipulate that the status conference set for August 13, 2018, by the Court’s  
17 order of April 2, 2018 [Doc. 3], is vacated

18 Dated: July 12, 2018.

19 Respectfully submitted,

20 /s/ Peter J. McVeigh

21 JEFFREY H. WOOD

22 Acting Assistant Attorney General

23 ERIC GRANT

24 Deputy Assistant Attorney General

25 JUSTIN HEMINGER

26 STACY STOLLER

27 PETER J. McVEIGH

28 Attorneys

Environment and Natural Resources Division

U.S. Department of Justice

McGREGOR W. SCOTT

United States Attorney

DAVID T. SHELLDY

Civil Chief, Assistant United States Attorney

Counsel for Plaintiff United States of America

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: July 12, 2018

/s/ John Killeen (as authorized on July 12, 2018)  
XAVIER BECERRA  
Attorney General of California  
JAMEE JORDAN PATTERSON  
Supervising Deputy Attorney General  
BENJAMIN M. GLICKMAN  
Supervising Deputy Attorney General  
ANDREW M. VOGEL  
Deputy Attorney General

JOHN W. KILLEEN  
Deputy Attorney General  
Attorneys for the State Defendants

IT IS SO ORDERED.

Dated: July 12, 2018

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE