

1 IGNACIA S. MORENO
Assistant Attorney General
2 Environment & Natural Resources Division

3 CHARLES R. SHOCKEY, Attorney
(D.C. Bar No. 914879)
4 Natural Resources Section
Sacramento Field Office
5 Environment and Natural Resources Division
United States Department of Justice
6 501 "I" Street, Suite 9-700
7 Sacramento, CA 95814-2322
Telephone: (916) 930-2203
8 Facsimile: (916) 930-2210
Email: charles.shockey@usdoj.gov

9 Attorneys for Defendants Leon Panetta, *et al.*^{1/}

10 IN THE UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

14 CENTER FOR BIOLOGICAL DIVERSITY, *et al.*,
15 Plaintiffs,
16 v.
17 LEON PANETTA, Secretary of Defense, *et al.*
18 Defendants.

Civil Action No. C-03-4350 MHP
JOINT STIPULATION TO
CONTINUE DATE FOR
SUBMISSION OF JOINT
STATUS REPORT
AND ORDER [~~PROPOSED~~]

20 WHEREAS, on August 12, 2011, the court issued an "Order Re Status" (Doc. 140),
21 posing questions regarding the status of the case and directing the parties to file a Joint Case
22 Management Statement to address those questions and future proceedings by August 25, 2011,

23 WHEREAS, counsel for the defendants was on vacation from August 8-22 and did not
24 have an opportunity to read the court's order until he returned to the office on August 22,

26 ^{1/} On June 22, 2011, the United States Senate confirmed Leon Panetta as Secretary of Defense.
27 Mr. Panetta automatically substitutes for his predecessor, Robert M. Gates, as the named defendant
28 in this action, pursuant to Fed. R. Civ. P. 25(d).

1 WHEREAS, the defendants' counsel forwarded the court's order to his clients on August
2 22 and was advised that the defendants will require additional time beyond August 25 to provide
3 responses to the court's questions regarding the status of the draft environmental impact report
4 and the proposed relocation of the Futenma Replacement Facility,

5 WHEREAS, the defendants' counsel contacted counsel for the plaintiffs on August 22
6 and requested an extension of time of two weeks for the preparation and submission of the Joint
7 Case Management Statement, and

8 WHEREAS, counsel for the plaintiffs does not object to the requested two-week
9 extension,

10 NOW, THEREFORE, the parties stipulate to a two-week extension until September 8,
11 2011, to submit the Joint Case Management Statement and request that the court approve this
12 stipulation to continue the deadline from August 25 to September 8, 2011.

13 So stipulated and respectfully submitted on August 23, 2011.

14 /s/ Charles R. Shockey

/s/ Sarah H. Burt


15 CHARLES R. SHOCKEY, DC BAR # 914879
16 Attorney, Natural Resources Section
17 Environment and Natural Resources Division
18 United States Department of Justice
19 501 "I" Street, Suite 9-700
20 Sacramento, California 95814-2322
Telephone: (916) 930-2203
Facsimile: (916) 930-2210
Counsel for Defendants

J. MARTIN WAGNER, CSB No. 100049
SARAH H. BURT, CSB No. 250378
Earthjustice
426 17th Street, 6th Floor
Oakland, CA 94612
Telephone: (510) 550-6700
Facsimile: (510) 550-6740
Counsel for Plaintiffs

21 ORDER

22 The Court here approves and adopts the parties' joint stipulation and continues the date
23 for submission of the Joint Case Management Statement from August 25 to September 8, 2011.

24
25 DATED: 8/24/11 _____

26 
27 MARILYN HALL PATED
28 UNITED STATES DISTRICT JUDGE