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18 Attorney for Defendant
 19 WASTE MANAGEMENT OF ALAMEDA COUNTY, INC.

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22 CALIFORNIA SPORTFISHING
 23 PROTECTION ALLIANCE, a non-profit
 24 corporation,

24 Plaintiff,

25 vs.

26 WASTE MANAGEMENT OF ALAMEDA
 27 COUNTY, INC., a corporation.

28 Defendant.

Case No. 3:08-cv-03497-SC

STIPULATION TO CONTINUE
 DISCOVERY DEADLINES PENDING
 MEDIATION; [~~PROPOSED~~] ORDER

Judge: Hon. Samuel Conti

1 **I. REQUEST AND STIPULATION RE CONTINUING DISCOVERY DEADLINES**

2 WHEREAS, Plaintiff California Sportfishing Protection Alliance served the Complaint in
3 this action on Defendant Waste Management of Alameda County, Inc. (“WMAC”) on September 4,
4 2008;

5 WHEREAS, Defendant filed its answer in this action on September 30, 2008;

6 WHEREAS, the parties filed a joint case management conference statement on November
7 13, 2008;

8 WHEREAS, both before and after the filing and service of the Complaint, the parties have
9 engaged in and are continuing to engage in discussions and negotiations to fully resolve this matter
10 and have made significant progress on a potential settlement;

11 WHEREAS, the parties conferred in an ADR conference call on December 17, 2008, with
12 Daniel Bowling, an ADR Program Staff Attorney for the Northern District of California, and
13 decided to engage in a mediation to be scheduled during January 2009 to help reach a settlement;

14 WHEREAS, the parties agreed to extend the deadlines for all written discovery, including
15 both the initial disclosures and the written discovery that has already been served, to February 25,
16 2009, in order to focus their efforts on the mediation settlement discussions;

17 WHEREAS, the parties agreed to schedule and conduct a Rule 34 site inspection within two
18 weeks of the mediation should the mediation not result in a settlement;

19 THEREFORE, IT IS HEREBY STIPULATED by and among Plaintiff California
20 Sportfishing Protection Alliance and Defendant Waste Management of Alameda County, Inc. that
21 the parties shall have to and including February 25, 2009 to complete pending written discovery and
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1 initial disclosures, and that a Rule 34 site inspection shall take place within two weeks of an
2 unsuccessful mediation.

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4 Dated: January 6, 2009

5 Respectfully submitted,
6 LOZEAU DRURY LLP

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8 By: /s/ Douglas J. Chermak
9 DOUGLAS J. CHERMAK
10 Attorneys for Plaintiff
11 CALIFORNIA SPORTFISHING
12 PROTECTION ALLIANCE

13 REED SMITH LLP

14 By: /s/ Julia C. Butler (as authorized on 1/6/09)
15 JULIA C. BUTLER
16 Attorneys for Defendant
17 WASTE MANAGEMENT OF ALAMEDA
18 COUNTY, INC.

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II. ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/6/09

Hon. Samuel Conti
United States District Court Judge

