

1 IGNACIA S. MORENO
Assistant Attorney General
2 Environment & Natural Resources Division
United States Department of Justice
3 DAVID B. GLAZER (D.C. 400966)
Natural Resources Section
4 Environment & Natural Resources Division
United States Department of Justice
5 301 Howard Street, Suite 1050
San Francisco, California 94105
6 TEL: (415) 744-6491
FAX: (415) 744-6476
7 e-mail: david.glazer@usdoj.gov
MEREDITH L. FLAX (D.C. 468016)
8 Wildlife and Marine Resources Section
Environment & Natural Resources Division
9 United States Department of Justice
P.O. Box 7369, Ben Franklin Station
10 Washington, D.C. 20044-7369
TEL: (202) 305-0404
11 FAX: (202) 305-0275
e-mail: meredith.flax@usdoj.gov
12

13 Attorneys for Federal Defendant
14

15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 THE WILDERNESS SOCIETY, *et al.*,

20 Plaintiffs,

21 v.

22 U.S. DEPARTMENT OF THE INTERIOR, *et al.*,

23 Defendants.
24
25
26

No. 3:09-cv-03048 VRW

STIPULATION OF THE PARTIES AND
~~PROPOSED~~ ORDER FURTHER EXTEND-
ING STAY OF PROCEEDINGS

Date: N/A

Time: N/A

Hon. Vaughn R. Walker

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28
Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 VRW
Stipulation of the Parties and Proposed Order Further Extending Stay of Proceedings

1 Plaintiffs Wilderness Society, *et al.*, and Defendants United States Department of the Interior, *et*
2 *al.*, submit this Stipulation and Proposed Order seeking an extension of the 60-day stay of litigation
3 issued by this Court on September 28, 2009 [Dkt. #24] and extended by additional periods of 60 days
4 each on December 10, 2009 [Dkt. #27], and February 4, 2010 [Dkt. #33].

5 The Parties jointly moved for a stay of proceedings [Dkt. #23] in order to accommodate settle-
6 ment negotiations. The Parties requested that the Court extend that stay [Dkt. ##26, 32] in furtherance
7 of those settlement proceedings.

8 Since that time, the parties have met face-to-face and by video-conference to discuss options for
9 resolving this case without litigation. The parties have agreed to a further exchange of information in
10 April and have scheduled another meeting for that month. The parties believe that a further stay would
11 assist the progress of these negotiations.

12 Accordingly, the parties hereby stipulate, subject to Court approval, to a further stay of all pro-
13 ceedings for an additional 120 days from March 29, 2010.¹

14 SO STIPULATED:

15 FOR THE PLAINTIFFS

16 DATED: March 25, 2010

/s/ Katherine D. Renshaw

KATHERINE D.RENSHAW

[Concurrence obtained per General Order 45.X]

(Admitted *pro hac vice*)

Earthjustice

1625 Massachusetts Ave., N.W.

Suite 702

Washington, D.C. 20036-2212

Tel: (202) 667-4500

Fax: (202) 667-2356

E-mail: krenshaw@earthjustice.org

JAMES S. ANGELL

(Admitted *pro hac vice*)

Earthjustice

26 ¹ A hearing on the motion to intervene filed by Edison Electric Institute, *et al.* [Dkt. #28] has been reset
27 by the Court for July 1, 2010 [Dkt. #34].

1 1400 Glenarm Place, Suite 300
2 Denver, CO 80202
3 Tel: (303) 623-9466
4 Fax: (303) 623-8083
5 E-mail: jangell@earthjustice.org
6 GREGORY C. LOARIE
7 (Cal. Bar No. 2151859)
8 Earthjustice
9 426 17th Street, 6th Floor
10 Oakland, CA 94612
11 Tel: (510) 550-6700
12 Fax: (510) 550-6740
13 E-mail: gloarie@earthjustice.org

14 *Counsel for Plaintiffs, The Wilderness Society, Bark; Center for Bio-*
15 *logical Diversity; Defenders of Wildlife; Great Old Broads for Wil-*
16 *derness; Klamath-Siskiyou Wildlands Center; National Parks Con-*
17 *servation Association; National Trust for Historic Preservation; Nat-*
18 *ural Resources Defense Council; Oregon Natural Desert Association;*
19 *Sierra Club; Southern Utah Wilderness Alliance; Western Resource*
20 *Advocates; Western Watersheds Project; County of San Miguel, CO*

21 AMY R. ATWOOD
22 (Admitted *pro hac vice*)
23 Center for Biological Diversity
24 P.O. Box 11374
25 Portland, OR 97211-0374
26 Tel: (503) 283-5474
27 Fax: (503) 283-5528
28 E-mail: atwood@biologicaldiversity.org

29 *Counsel for Plaintiffs, Center for Biological Diversity; The Wilder-*
30 *ness Society; Klamath-Siskiyou Wildlands Center; and San Miguel*
31 *County, Colorado*

32 FOR THE DEFENDANTS

33 DATED: March 25, 2010

34 IGNACIA S. MORENO
35 Assistant Attorney General
36 Environment & Natural Resources Division

37 */s/*David B. Glazer
38 DAVID B. GLAZER
39 Natural Resources Section
40 Environment & Natural Resources Division
41 United States Department of Justice
42 301 Howard Street, Suite 1050
43 San Francisco, California
44 Tel: (415) 744-6491
45 Fax: (415) 744-6476
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12
13 ATTORNEY ATTESTATION OF CONCURRENCE

14 I hereby attest that I have obtained concurrence in this filing for the signature of Plaintiffs' counsel indicated by a "conformed" signature ("/s/") within this e-filed document.

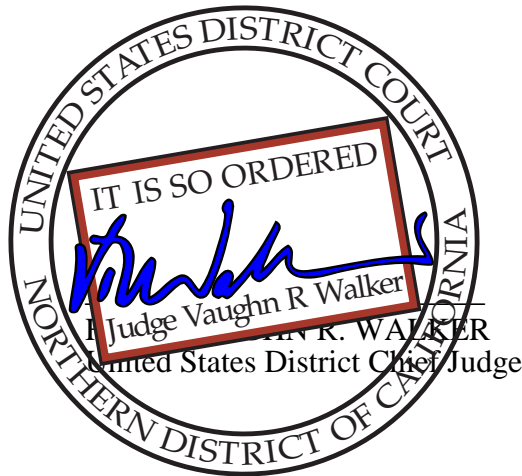
15 Dated: March 25, 2010

16 /s/David B. Glazer
17 DAVID B. GLAZER
18 Natural Resources Section
19 Environment and Natural Resources Division
20 United States Department of Justice
21 301 Howard Street, Suite 1050
22 San Francisco, California 94105
23 Telephone: (415) 744-6491
24 Facsimile: (415) 744-6476
25 E-mail: david.glazer@usdoj.gov

~~PROPOSED~~ ORDER

Upon consideration of the Parties' Stipulation to Extend Stay of Proceedings, good cause having been shown, it is hereby ORDERED that the stay of proceedings issued on September 28, 2009, is hereby extended, and all proceedings are hereby stayed for an additional 120 days from March 29, 2010.

Date: 3/30/2010



1 CERTIFICATE OF SERVICE

2 I, David B. Glazer, hereby certify that I have caused the foregoing to be served upon counsel of
3 record through the Court's electronic service system and by U.S. Mail, postage prepaid, on the following
4 counsel:

5 James S. Angell, Esq.
6 Shute Mihaly & Weinberger
7 612 Old Santa Fe Trail, Suite B
8 Santa Fe, New Mexico 87501
9

10
11 I declare under penalty of perjury that the foregoing is true and correct.
12

13
14 Dated: March 25, 2010

/s/David B. Glazer
David B. Glazer