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15	UNITED STATES	DISTRICT COURT
16	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
17	SAN FRANCISCO DIVISION	
18		
19	THE WILDERNESS SOCIETY, et al.,	No. 3:09-cv-03048 VRW
20	Plaintiffs,	STIPULATION OF THE PARTIES AND
21	V.	[PROPOSED] ORDER FURTHER EXTEND- ING STAY OF PROCEEDINGS
22	U.S. DEPARTMENT OF THE INTERIOR, et al.,	
23	Defendants.	Date: N/A
24	Derendants.	
		Time: N/A
25		Hon. Vaughn R. Walker
26		
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28		
	<i>Wilderness Soc'y, et al. v. U.S. Dep't of Interior</i> , No Stipulation of the Parties and Proposed Order Further	
		Dockets.Ju

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Plaintiffs Wilderness Society, et al., and Defendants United States Department of the Interior, et al., submit this Stipulation and Proposed Order seeking an extension of the 60-day stay of litigation issued by this Court on September 28, 2009 [Dkt. #24] and extended by additional periods of 60 days each on December 10, 2009 [Dkt. #27] and February 4, 2010 [Dkt. #33], and for an additional 120 days on March 30, 2010 [Dkt. #36]. The Parties jointly moved for a stay of proceedings [Dkt. #23] in order to accommodate settlement negotiations. The Parties requested that the Court extend that stay [Dkt. ##26, 32, 35] in further-

Since that time, the parties have continued to make progress towards resolving this case without litigation. The parties believe that a further stay would assist the progress of those negotiations.

Accordingly, the parties hereby stipulate, subject to Court approval, to a further stay of all proceedings for an additional 120 days from July 27, 2010.¹

SO STIPULATED:

FOR THE PLAINTIFFS

DATED: July 23, 2010	/s/James S. Angell JAMES S. ANGELL (Admitted pro hac vice) Earthjustice 1400 Glenarm Place, Suite 300 Denver, CO 80202 Tel: (303) 623-9466 Fax: (303) 623-8083 E-mail: jangell@earthjustice.org
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¹ A hearing on the motion to intervene filed by Edison Electric Institute, *et al.* [Dkt. #28] has been reset by the Court for August 12, 2010 [Dkt. Entry of June 7, 2010]. The Federal Defendants have since filed a statement of non-opposition to that motion [Dkt. #39], and the Plaintiffs have filed a similar statement [Dkt. #40].

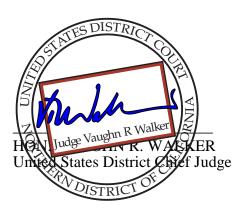
Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 VRW Stipulation of the Parties and Proposed Order Further Extending Stay of Proceedings

1	Counsel for Plaintiffs, The Wilderness Society, Bark; Center for Bio- logical Diversity; Defenders of Wildlife; Great Old Broads for Wil-
2	derness; Klamath-Siskiyou Wildlands Center; National Parks Con-
3	servation Association; National Trust for Historic Preservation; Nat- ural Resources Defense Council; Oregon Natural Desert Association;
4	Sierra Club; Southern Utah Wilderness Alliance; Western Resource Advocates; Western Watersheds Project; County of San Miguel, CO
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	County, Colorado
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13	FOR THE DEFENDANTS
14	DATED: July 23, 2010 IGNACIA S. MORENO
15	Assistant Attorney General Environment & Natural Resources Division
16	<u>/s/David B. Glazer</u> DAVID B. GLAZER
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27	e man. <u>meredini nave usuoj gov</u>
28	Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 VRWStipulation of the Parties and Proposed Order Further Extending Stay of Proceedings2

1	ATTORNEY ATTESTATION OF CONCURRENCE	
2	I hereby attest that I have obtained concurrence in this filing for the signature of Plaintiffs' coun-	
3	sel indicated by a "conformed" signature ("/s/") within this e-filed document.	
4		
5		
6	Dated: July 23, 2010 /s/David B. Glazer	
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28	Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 VRWStipulation of the Parties and Proposed Order Further Extending Stay of Proceedings3	

[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 July 27, 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.	
4		
5	I declare under penalty of perjury that the foregoing is true and correct.	
6		
7		
8	Dated: July 23, 2010 /s/ <u>David B. Glazer</u> David B. Glazer	
9	David B. Glazer	
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28	Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 VRWStipulation of the Parties and Proposed Order Further Extending Stay of Proceedings5	