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	UNITED STATES	DISTRICT COURT
15	FOR THE NORTHERN DI	STRICT OF CALIFORNIA
16	SAN FRANCIS	SCO DIVISION
17	SARVI KARVEIL	Jeo Bivision
18		
19	THE WILDERNESS SOCIETY, et al.,	No. 3:09-cv-03048 VRW
20	Plaintiffs,	STIPULATION OF THE PARTIES AND
	v.	[PROPOSED] ORDER FURTHER EXTENDING STAY OF PROCEEDINGS
21	U.S. DEPARTMENT OF THE INTERIOR, et al.,	
22	Defendants.	Date: N/A
23	Defendants.	
24		Time: N/A
25		Hon. Vaughn R. Walker
26		
27		
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	Wilderness Soc'y, et al. v. U.S. Dep't of Interior, No Stipulation of the Parties and Proposed Order Furthern	

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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 each on March 30, 2010 [Dkt. #36] and July 27, 2010 [Dkt. #42].

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, 41] in furtherance of those settlement proceedings.

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 90 days from November 26, 2010.

SO STIPULATED:

FOR THE PLAINTIFFS

DATED: November 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
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1		Sierra Club; Southern Utah Wilderness Alliance; Western Resource Advocates; Western Watersheds Project; County of San Miguel, Co
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8		ness Society; Klamath-Siskiyou Wildlands Center; and San Miguel County, Colorado
9		County, Colorado
10		FOR THE DEFENDANTS
11	DATED: November 23, 2010	IGNACIA S. MORENO
12		Assistant Attorney General Environment & Natural Resources Division
13		<u>/s/ Meredith L. Flax</u> MEREDITH L. FLAX
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ATTORNEY ATTESTATION OF CONCURRENCE

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.

Dated: November 23, 2010 /s/ Meredith L. Flax MEREDITH L. FLAX

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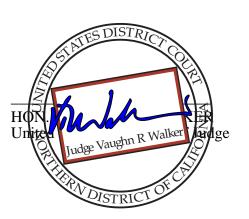
FROPOSED ORDER

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 30 days from November 26, 2010.

until March 1, 2011 or such time as the parties advise the court that they have reached an

agreed upon disposition.

Date: November 29, 2010



CERTIFICATE OF SERVICE

I, Meredith L. Flax, hereby certify that I have caused the foregoing to be served upon counsel of record through the Court's electronic service system.

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

Dated: November 23, 2010 /s/ Meredith L. Flax Meredith L. Flax

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

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