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Attorneys for Federal Defendant

14  
 15 UNITED STATES DISTRICT COURT  
 16 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN FRANCISCO DIVISION

18 THE WILDERNESS SOCIETY, *et al.*,  
 19 Plaintiffs,  
 20 v.  
 21

No. 3:09-cv-03048 VRW

STIPULATION OF THE PARTIES AND  
~~PROPOSED~~ ORDER FURTHER EXTENDING  
STAY OF PROCEEDINGS

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

Date: N/A

Time: N/A

Hon. Vaughn R. Walker

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], and for an additional 120 days  
5 each on March 30, 2010 [Dkt. #36] and July 27, 2010 [Dkt. #42].

6 The Parties jointly moved for a stay of proceedings [Dkt. #23] in order to accommodate settle-  
7 ment negotiations. The Parties requested that the Court extend that stay [Dkt. ##26, 32, 35, 41] in fur-  
8 therance of those settlement proceedings.

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

11 Accordingly, the parties hereby stipulate, subject to Court approval, to a further stay of all pro-  
12 ceedings for an additional 90 days from November 26, 2010.

13 SO STIPULATED:

14 FOR THE PLAINTIFFS

15 DATED: November 23, 2010

/s/James S. Angell  
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25 *Counsel for Plaintiffs, The Wilderness Society, Bark; Center for Bio-*  
26 *logical Diversity; Defenders of Wildlife; Great Old Broads for Wil-*  
27 *derness; Klamath-Siskiyou Wildlands Center; National Parks Con-*  
*servation Association; National Trust for Historic Preservation; Nat-*  
*ural Resources Defense Council; Oregon Natural Desert Association;*

1 *Sierra Club; Southern Utah Wilderness Alliance; Western Resource*  
2 *Advocates; Western Watersheds Project; County of San Miguel, CO*

3 AMY R. ATWOOD  
4 (Admitted *pro hac vice*)  
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11 *Counsel for Plaintiffs, Center for Biological Diversity; The Wilder-*  
12 *ness Society; Klamath-Siskiyou Wildlands Center; and San Miguel*  
13 *County, Colorado*

14 FOR THE DEFENDANTS

15 DATED: November 23, 2010

16 IGNACIA S. MORENO  
17 Assistant Attorney General  
18 Environment & Natural Resources Division

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

*/s/ Meredith L. Flax*  
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~~PROPOSED~~ ORDER

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2  
3 Upon consideration of the Parties' Stipulation to Extend Stay of Proceedings, good cause having  
4 been shown, it is hereby ORDERED that the stay of proceedings issued on September 28, 2009, is here-  
5 by extended, and all proceedings are hereby stayed ~~for an additional 90 days from November 26, 2010.~~  
6 **until March 1, 2011 or such time as the parties advise the court that they have reached an**  
7 **agreed upon disposition.**  
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12 Date: November 29, 2010  
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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