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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 THE SIERRA CLUB and)
14 ENVIRONMENTAL INTEGRITY)
PROJECT,)

15 Plaintiffs,)

16 v.)

17 ENVIRONMENTAL PROTECTION)
18 AGENCY,)

19 Defendant.)

No. C 09-5662 MEJ

STIPULATION TO EXTEND TIME;
~~PROPOSED ORDER~~

20 On December 1, 2009, Plaintiff filed the above captioned action. The United States
21 Attorney's Office was served on December 7, 2009. Defendant will make its best efforts to locate
22 and release the requested documents within the next three and a half months, and the parties are
23 hopeful they will be able to reach an out of court settlement within the next 45 days. Accordingly,
24 the parties hereby stipulate, subject to the approval of the Court, to extend the time for Defendant
25 to answer the complaint by 45 days, from January 6, 2010 to February 22, 2010. The parties propose
26 the following modifications to the current case schedule:

27 Answer: February 22, 2010

28 ADR Certification and Stipulation: February 25, 2010

STIPULATION
C 09-5662 MEJ

1 The dates for the Case Management Statement and Case Management Conference shall
2 remain the same.

3 Dated: December 22, 2009

Respectfully submitted,

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 /s/
7 MELANIE L. PROCTOR¹
8 Assistant United States Attorney
9 Attorney for Defendant

10 Dated: December 23, 2009

/s/
11 DAVID A. BAHR
12 Attorney for Plaintiffs

13 ~~**PROPOSED ORDER**~~

14 Pursuant to the stipulation of the parties, IT IS SO ORDERED. Defendant's Answer shall
15 be due February 22, 2010. The parties shall file the ADR Certification and file either a Stipulation
16 to ADR Process or Notice of Need for ADR phone conference by February 25, 2010. The Case
17 Management Statement shall be filed on March 4, 2010, and the Case Management Conference shall
18 be held on March 11, 2010, at 10:00 a.m.

19 
20 MARIANA JAMES
21 United States Magistrate Judge

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28 ¹I, Melanie L. Proctor, hereby attest that I have on file all holograph signatures for any
signatures indicated by a "conformed" signature (/s/) within this efiled document.

STIPULATION
C 09-5662 MEJ