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 2 IN THE UNITED STATES DISTRICT COURT
 3 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 4 SAN FRANCISCO DIVISION

5 **CENTER FOR BIOLOGICAL**)
 6 **DIVERSITY**, a non-profit organization; and)
 7 **PESTICIDE ACTION NETWORK**)
 8 **NORTH AMERICA**, a non-profit)
 9 organization;)
 10 Plaintiffs,)
 11 v.)
 12 **ENVIRONMENTAL PROTECTION**)
 13 **AGENCY**; and **LISA JACKSON**,)
 14 Administrator, U.S. EPA;)
 15 Defendants.)

Case No. CV-11-0293-JCS

**STIPULATION TO EXTEND STAY
 WITH STATUS REPORT**

Magistrate Judge Joseph C. Spero

16 On January 20, 2011, the Center for Biological Diversity and the Pesticide Action Network
 17 North America (collectively “Plaintiffs”) initiated the instant litigation, alleging that the Environmental
 18 Protection Agency and its administrator, Lisa Jackson, (collectively “Defendants”) violated Section
 19 7(a)(2) of the Endangered Species Act (“ESA”) by failing to consult on the effects of EPA-registered
 20 pesticides on endangered and threatened species and their designated critical habitat throughout the
 21 United States of America. *See* Docket. No. 1. On March 14, 2011, Defendants and Plaintiffs jointly
 22 filed a motion to stay the litigation for 90 days to conserve judicial resources while the parties explore
 23 the possibility of settlement. *See* Docket No. 13. The Court granted the motion on March 15, 2011. *See*
 24 Docket No. 14. The stay expires on June 13, 2011.

25 On May 13, 2011, the parties met in Washington, D.C. and engaged in productive exploratory
 26 discussions concerning the possibility of settlement, as well as technical issues concerning EPA’s
 27 current endangered species risk assessment methods and associated regulatory programs. Proposed
 28 Intervenor were also present at the meeting. The parties have agreed that additional discussions are
 necessary and are in the process of arranging the details of the next meeting. To allow these discussions
 to continue, and in the interest of judicial economy, the parties respectfully request that this Court extend

1 the stay of this litigation for an additional 30 days. If the Court extends the stay, the parties will submit
2 a status report prior to the end of this 30-day period.

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4 Respectfully submitted this 27th day of May, 2011,

5 /s/ Collette L. Adkins Giese

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PURSUANT TO STIPULATION, IT IS SO ORDERED. Except for the pending Motions to Intervene.

Dated: 5/31/2011

