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 13 GLOBAL COMMUNITY MONITOR

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 GLOBAL COMMUNITY MONITOR, a
 17 non-profit corporation,

18 Plaintiff,

19 vs.

20 ALAMEDA COUNTY INDUSTRIES, INC.,
 21 a corporation,

22 Defendant.

Case No. 11-00976

**REQUEST AND [PROPOSED] ORDER TO
 CONTINUE CASE MANAGEMENT
 STATEMENT**

23 On March 2, 2011, Plaintiff filed its complaint in the above-entitled action. On June 9, 2011,
 24 Plaintiff completed its service by filing the waiver of service form. Defendant has until August 8,
 25 2011 to file its answer.

26 During the past few months, the parties have been negotiating a settlement agreement in lieu
 27 of moving forward with the litigation. The parties have reached a tentative agreement on most of
 28 the key issues and should complete negotiations and finalize a settlement within the next few weeks.

In order to give the parties ample time to complete a settlement agreement and submit it for a
 45-day review period to the Environmental Protection Agency and Department of Justice pursuant
 to 40 C.F.R. § 135.5, Plaintiff requests that the Case Management Conference currently scheduled
 for June 15, 2011, be continued to September 9, 2011, at 9:00 am.

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Dated: June 9, 2011

Respectfully submitted,

LOZEAU DRURY LLP

By: /s/ Douglas J. Chermak
Douglas J. Chermak
Attorneys for Plaintiff
GLOBAL COMMUNITY MONITOR

IT IS SO ORDERED.

