

1 AMANDA W. GOODIN (WSB #41312)

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3 *[Appearing Pro Hac Vice]*

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19 *Local Counsel for Plaintiffs*

20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 AT SAN FRANCISCO

23 BASEL ACTION NETWORK and SIERRA CLUB, )

) Civ. No. C11-6185 EMC

24 Plaintiffs, )

25 v. )

) STIPULATION REQUESTING

) REMOVAL FROM THE ADR

26 U.S. ENVIRONMENTAL PROTECTION )

) MULTI-OPTION PROGRAM AND

27 AGENCY, an agency of the United States; LISA P. )

) [PROPOSED] ORDER

28 JACKSON, Administrator, U.S. Environmental )

Protection Agency, in her official capacity, )

29 Defendants. )

30 STIPULATION REQUESTING REMOVAL FROM THE ADR

31 MULTI-OPTION PROGRAM AND [PROPOSED] ORDER

32 (Civ. No. 11-6185 EMC) -1-

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1 The undersigned parties appreciate the opportunity to participate in the Court's ADR  
2 multi-option program. However, the parties agree that the above-captioned case is not amenable  
3 to an intermediate resolution at this time, that none of the ADR processes are likely to lead to  
4 resolution of the case or deliver benefits sufficient to justify the resources consumed by its use,  
5 and that the case should continue before the Court. See ADR LR 3-5(e)(3). The parties  
6 therefore jointly stipulate and request, pursuant to ADR LR 3-3(c) and Civ. LR 7-12, that the  
7 Court remove the above-captioned case from its ADR multi-option program.

8 Respectfully submitted this 30th day of May, 2012.

9  
10 \_\_\_\_\_  
11 /s/ Amanda W. Goodin

12 AMANDA W. GOODIN (WSB #41312)

13 TODD D. TRUE (WSB #12864)

14 *[Appearing Pro Hac Vice]*

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*Local Counsel for Plaintiffs*

1 IGNACIA S. MORENO  
2 Assistant Attorney General  
3 Environment and Natural Resources Division

4 /s/ Amanda W. Goodin for, \*per email authorization

5 LESLIE M. HILL  
6 U.S. Department of Justice  
7 Environment & Natural Resources Division  
8 Environmental Defense Section  
9 601 D Street N.W., Suite 8000  
10 Washington D.C. 20004  
11 (202) 514-0375 | Phone  
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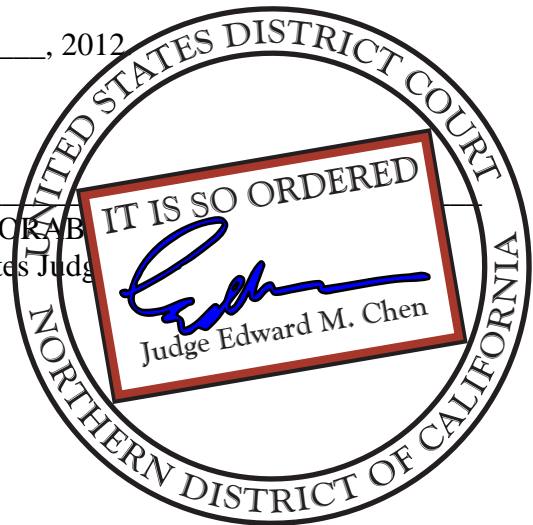
14 *Attorney for Federal Defendants*

15 ORDER

16 Pursuant to stipulation, IT IS SO ORDERED.

17 DATED this 4th day of June, 2012

18 THE HONORABLE  
19 United States Judge



1 CERTIFICATE OF SERVICE

2 I am a citizen of the United States and a resident of the State of Washington. I am over 18  
3 years of age and not a party to this action. My business address is 705 Second Avenue, Suite 203,  
4 Seattle, Washington 98104.

5 I HEREBY CERTIFY that on May 30, 2012, I electronically filed the following documents:

- 6 1. Stipulation Requesting Removal from the ADR Multi-Option Program  
7 and [Proposed] Order.

8 with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to  
9 the following:

10 Leslie M. Hill  
11 Assistant Attorney General  
12 Environmental Defense Section  
13 601 D Street N.W., Suite 8000  
14 Washington D.C. 20004  
15 (202) 514-0375 | Phone  
16 (202) 514-8865 | Fax  
17 leslie.hill@usdoj.gov  
18 *Attorney for Federal Defendants*


- via facsimile  
 via overnight courier  
 via first-class U.S. mail  
 via hand delivery  
 via e-mail  
 via electronic service by Clerk

19 AND I FURTHER CERTIFY that I have mailed by United States Postal Service the  
20 documents to the following non-CM/ECF participants:

21 None

22 I, Cheryl McEvoy, declare under penalty of perjury that the foregoing is true and correct.

23 Executed this 30th day of May, 2012, at Seattle, Washington.

24  
25  
26  
27  
28  
  
Cheryl McEvoy