1	AMANDA W. GOODIN (WSB #41312) TODD D. TRUE (WSB #12864)	HONORABLE EDWARD M. CHEN
2	[Appearing Pro Hac Vice]	
3	Earthjustice 705 Second Avenue, Suite 203	
4	Seattle, WA 98104	
	(206) 343-7340 Phone (206) 343-1526 Fax	
5	agoodin@earthjustice.org	
6	ttrue@earthjustice.org	
7	Attorneys for Plaintiffs	
8	Erin Tobin (CSB #234943)	
9	Earthjustice 50 California Street, Suite 500	
10	San Francisco, CA 94111-4608	
	(415) 217-2000 Phone (415) 217-2040 Fax	
11	etobin@earthjustice.org	
12	Local Counsel for Plaintiffs	
13	UNITED STATES DIST	RICT COURT
14	FOR THE NORTHERN DISTRI AT SAN FRANC	
15		
16	BASEL ACTION NETWORK and SIERRA CLUB,) Civ. No. C11-6185 EMC
	Plaintiffs,)
17	V.) STIPULATION FOR EXTENSION;
18) [PROPOSED] ORDER
19	U.S. ENVIRONMENTAL PROTECTION AGENCY, an agency of the United States; LISA P.)
20	JACKSON, Administrator, U.S. Environmental)
21	Protection Agency, in her official capacity,))
22	Defendants.	
23		,
24		
25		
26		
27	CTIDITI ATION EOD EVTENCION, IDDODOCEDI	Earthjustice 705 Second Ave., Suite 203
28	STIPULATION FOR EXTENSION; [PROPOSED] ORDER (Civ. No. 11-6185 EMC) -1-	Seattle, WA 98104 (206) 343-7340

1	Pursuant to Civil L.R. 6-2, Basel Action Network ("BAN") and Sierra Club (collectively	
2	"Plaintiffs") and Defendant United States Environmental Protection Agency ("EPA") and Lisa F	
3	Jackson, Administrator, U.S. EPA, in her official capacity (collectively "Defendants"), hereby	
4	stipulate to and request an order removing the June 19, 2012 Case Management Conference	
5	("CMC") from the calendar (Dkt. 29). The parties further stipulate to and request a new date for	
6	the initial CMC after the parties have received the court's order on Defendants' motion to	
7	dismiss (Dkt. 13), which is currently pending. In support of this stipulation, Plaintiffs submit the	
8	attached declaration from Amanda W. Goodin, counsel of record for Plaintiffs.	
9	Respectfully submitted this 8th day of June, 2012.	
10		
11	/s/ (electronic mail authorization 6/8/12)	
12	AMANDA W. GOODIN (WSB #41312)	
13	TODD D. TRUE (WSB #12864) [Appearing Pro Hac Vice]	
14	Earthjustice 705 Second Avenue, Suite 203	
15	Seattle, WA 98104 (206) 343-7340 Phone	
16	(206) 343-1526 Fax	
17	agoodin@earthjustice.org ttrue@earthjustice.org	
18	Attorneys for Plaintiffs	
19	Erin Tobin (CSB #234943)	
20	Earthjustice	
21	426 Seventeenth Street, 5th Floor Oakland, CA 94612-2807	
22	(415) 217-2000 Phone (415) 217-2040 Fax	
23	etobin@earthjustice.org	
24	Local Counsel for Plaintiffs	
25		
26		
27		

STIPULATION FOR EXTENSION; [PROPOSED] ORDER (Civ. No. 11-6185 EMC) -2-

Earthjustice 705 Second Ave., Suite 203 Seattle, WA 98104 (206) 343-7340

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

<u>/s/</u>___

LESLIE M. HILL (DCB #476008)
U.S. Department of Justice
Environment & Natural Resources Division
Environmental Defense Section
601 D Street N.W., Suite 8000
Washington D.C. 20004
(202) 514-0375 | Phone
(202) 514-8865 | Fax
leslie.hill@usdoj.gov

Attorney for Defendants

[PROPOSED] ORDER

Pursuant to Stipulation, IT IS SO ORDERED. The 6/19/12 CMC is reset for 7/13/12 at 9:00 a.m. A joint CMC Statement 2012. shall be filed by 7/6/12.

