1 2 3 4 5	ANDREW L. PACKARD (State Bar No. 168690)  EMILY J. BRAND (State Bar No. 267564)  Law Offices of Andrew L. Packard  100 Petaluma Blvd. N. Ste. 301  Petaluma, CA 94952  Tel: (707) 763-7227  Fax: (415) 763-9227  E-mail: andrew@packardlawoffices.com			
7	UNITED STATES DISTRICT COURT			
	NORTHERN DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA			
8	CALIFORNIA SPORTFISHING			
9	PROTECTION ALLIANCE, a non-profit corporation;	Case No. 3:12-CV-06274-SI		
10	Plaintiff,			
11	vs.	STIPULATION TO CONTINUE CASE MANAGEMENT SCHEDULE;		
12 13	GEORGIA-PACIFIC GYPSUM LLC, a Delaware limited liability company;	DECLARATION OF EMILY BRAND; [PROPOSED] ORDER [Civil L.R. 16-2(d)]		
1.4	GEORGIA-PACIFIC BUILDING PRODUCTS LLC, a Delaware limited liability company; RICK TURNER, an			
14				
15	individual; MANOJ MATHUR, an individual; ROBERT CYPHERS, an			
16 17	individual; JEREMIAH DAVIS, an individual; MICHAEL WOODY, an individual; FRED CURCIO, an			
	individual,			
18	Defendants.			
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21	Plaintiff California Sportfishing Protection Alliance ("CSPA") together with			
22 23	Defendants Georgia-Pacific Gypsum LLC, Georgia-Pacific Building Products LLC,			
24	Robert Cyphers, Jeremiah Davis, Michael Woody, Fred Curcio, Rick Turner and			
25	Manoj Mathur hereby stipulate and move to continue the remaining case			
26	management schedule dates set in the Order dated December 11, 2012 (Court Doc			
27 28	#3) and amended by the Case Management Conference Order (Court Doc #8) to be			
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	continued by a period of thirty (30) days.		
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3	Date: February 28, 2013	LAW OFFICES OF ANDREW L. PACKARD	
4		/s/ Emily J. Brand	
5		Emily J. Brand	
6		Attorneys for Plaintiff California Sportfishing Protection Alliance	
7			
8	Date: February 28, 2013	COX CASTLE & NICHOLSON LLP	
9		/s/ Robert P. Doty	
10		Robert P. Doty	
11		Attorneys for Defendants Georgia-Pacific Gypsum LLC, et al.	
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## DECLARATION OF EMILY BRAND

- 1. I am an attorney for Plaintiff California Sportfishing Protection Alliance, herein.
- 2. This action is a complaint for declaratory and injunctive relief and civil penalties brought against Defendants Georgia-Pacific Gypsum LLC, Georgia-Pacific Building Products LLC, Robert Cyphers, Jeremiah Davis, Michael Woody, Fred Curcio, Rick Turner and Manoj Mathur ("Defendants"), for current and ongoing violations of the Clean Water Act, 33 U.S.C. § 1251 to § 1387. The action was filed on December 11, 2012.
- 3. Plaintiff has not served Defendants at this time.
- 4. The parties are in active negotiations to settle the matter and hope to reach a complete resolution of this matter soon. Plaintiff has presented Defendants with a settlement proposal and Defendants have provided substantive comments on this agreement.
- 5. The parties agree that it is in their mutual best interests to request a short continuation of all Court deadlines to allow the parties to continue the settlement negotiations.
- 6. I am therefore requesting all current deadlines be extended thirty days, to allow Plaintiff and Defendants to come to a settlement agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in Berkeley, CA on February 28, 2013.

Dated: 2/28/2013 Law Offices of Andrew L. Packard

By: /s/ Emily J. Brand
Emily J. Brand
Attorneys for Plaintiff

[PROPOSED ORDER]					
GOOD CAUSE APPEARING, it is hereby, ORDERED, that the deadlines set forth in the Clerk's					
Notice Setting Case Management Conference be extended as follows:					
Last day to file Rule 26(f) Report, complete initial disclosures or state Objection and file Case Management Statement		- April 5, 2013			
		19			
nitial Ca	ase Management	Conference	- April 15, 2013		
Dated: _	3/6/13	Suran	laton		
UNITED STATES DISTRICT JUDGE					
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