

Christopher Sproul (State Bar No. 126398)
Jodene Isaacs (State Bar No. 226895)
Environmental Advocates
5135 Anza Street
San Francisco, California 94121
Telephone: (415) 533-3376, (510) 847-3467
Facsimile: (415) 358-5695
Email: csproul@enviroadvocates.com
Email: jisaacs@enviroadvocates.com

Michael A. Costa (Bar No. 219416)
3848 Sacramento St. #2
San Francisco, CA 94118
Telephone: (415) 342-0042
Email: mike@ocefoundation.org

Patricia Weisselberg (Bar No. 253015)
Law Office of Patricia Weisselberg
115 Oakdale Avenue
Mill Valley, CA 94941
Telephone: (415) 388-2303
Email: pweisselberg@wans.net

Attorneys for Plaintiffs
OUR CHILDREN'S EARTH FOUNDATION and
ECOLOGICAL RIGHTS FOUNDATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OUR CHILDREN'S EARTH FOUNDATION, a
non-profit corporation, and ECOLOGICAL
RIGHTS FOUNDATION, a non-profit
corporation,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES SERVICE,
PENNY PRITZKER, as Secretary of
Commerce, WILLIAM STELLE, as Regional
Administrator of the National Marine Fisheries
Service West Coast Region, UNITED STATES
ARMY CORPS OF ENGINEERS, and JOHN
MCHUGH, as Secretary of the Army,

Defendants.

Case No. 14-cv-01130 WHO
Case No. 14-cv-04365 WHO
Case No. 15-cv-02558 WHO

**STIPULATION FOR BRIEFING
SCHEDULE ON ATTORNEYS FEE
MOTION AND ORDER**

1 Pursuant to Civil Local Rules 6-2 and 54-5, Plaintiffs Our Children's Earth Foundation and
2 Ecological Rights Foundation ("Plaintiffs"), and Defendants National Marine Fisheries Service, Penny
3 Pritzker as Secretary of Commerce, and William Stelle as Regional Administrator of the National
4 Marine Fisheries Service West Coast ("Defendants") hereby stipulate and respectfully request of the
5 Court an order providing a briefing schedule and hearing date for Plaintiffs' motion for attorneys' fees
6 and costs.

7 WHEREAS, on February 16, 2016, the Court entered the parties' Stipulated Judgment in Related
8 Cases (Dkt. # 79) and ordered the parties to meet and confer regarding Plaintiffs' claim for attorneys'
9 fees and costs in connection with the three related actions and report to the Court by March 25, 2016,
10 regarding whether the parties have reached agreement or whether Plaintiffs' attorneys fees and costs
11 claim will be presented to the Court for consideration;

12 WHEREAS, the Parties previously requested and the Court granted an order providing Plaintiffs
13 until April 15, 2016 to file their motion for attorney fees so the parties could continue settlement
14 discussions;

15 WHEREAS, the Parties are still presently engaged in settlement discussions which they mutually
16 believe they need additional time to complete and hopefully avoid the expense and burden on the parties
17 and their Court of additional litigation;

18 NOW THEREFORE, to allow the parties sufficient time to attempt to continue settlement
19 discussions, the parties respectfully request that the Court enter the attached order providing Plaintiffs
20 until May 11, 2016 to file their motion for fees and costs; providing Defendants until May 25, 2016 to
21 file their opposition to Plaintiffs' motion for fees and costs; providing Plaintiffs until June 1, 2016 to file
22 their reply in support of their motion; and providing that the hearing on this matter be scheduled for
23 June 15, 2016 at 2:00 p.m.

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1 Respectfully submitted this 23rd day of March, 2016.

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3 /s/Christopher Sproul
4 CHRISTOPHER SPROUL

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6 BRIAN J. STRETCH
7 Acting United States Attorney

8
9 /s/ Robin M. Wall
10 ROBIN M. WALL
11 Assistant United States Attorney
12 Attorney for Defendants

13 CERTIFICATION

14 Pursuant to Civil L.R. 5-1(i)(3), the undersigned hereby attests that counsel for Plaintiffs has
15 concurred in the filing of this document.

16 Dated: March 23, 2016

17 /s/ Robin M. Wall
18 ROBIN M. WALL
19 Assistant United States Attorney
20 Attorney for Defendants
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Dated: March 24, 2016

HON. WILLIAM H. ORRICK