MICHAEL CONNETT, ESQ., CA Bar No. 300314 1 CHRIS NIDEL, ESQ., D.C. Bar No. 497059 FOOD & WATER WATCH 2 1814 Franklin St., Suite 1100 3 Oakland, California 94612 Telephone: (510) 922-0720 4 Facsimile: (310) 922-0723 5 Attorneys for Plaintiffs 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 Case No.: 17-cv-02162-EMC FOOD & WATER WATCH, INC, et al., 12 Plaintiffs. 13 v. 14 U.S. Environmental Protection Agency, 15 et al.. 16 Defendants. 17 STIPULATION TO EXTEND DEADLINES FOR EPA'S MOTION FOR 18 PROTECTIVE ORDER BRIEFING SCHEDULE 19 20 Plaintiffs Food & Water Watch, et al., and Defendants United States 21 Environmental Protection Agency, et al., ("EPA") hereby stipulate to and request that the 22 Court enter the attached Order extending the deadlines associated with EPA's motion for 23 a protective order. 24 1. Pursuant to the Court's September 12, 2017 Order (ECF No. 27), EPA's 25 motion for a protective order is due 12/7/17, Plaintiffs' response is due 12/21/17, EPA's 26 reply is due 1/4/18, and the hearing date is 1/18/18. 27 28 CASE No. 17-CV-02162-EMC STIPULATION TO EXTEND DEADLINES FOR EPA'S MOTION FOR PROTECTIVE ORDER BRIEFING SCHEDULE AND [PROPOSED] ORDER

Hearing and Further Case Management Conference – January 25, 2018 Respectfully submitted, /s/ Michael Connett MICHAEL CONNETT **CHRIS NIDEL** Food & Water Watch 1814 Franklin St., Suite 1100 Oakland, CA 94612 Tel: (510) 922-0720 Attorneys for Plaintiffs JEFFREY H. WOOD Acting Assistant Attorney General /s/ *Norman L. Rave, Jr.* (by CASE No. 17-CV-02162-EMC STIPULATION TO EXTEND DEADLINES FOR EPA'S MOTION FOR PROTECTIVE ORDER BRIEFING SCHEDULE AND [PROPOSED] ORDER 2

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Attorneys for Defendants

CASE No. 17-CV-02162-EMC

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## [PROPOSED] ORDER

Before the Court is the parties' Stipulation to Extend the Deadlines for EPA's Motion for a Protective Order Briefing Schedule And [Proposed] Order.. Upon due consideration, and for good cause shown, the parties' request is hereby GRANTED. It is further ordered that the following schedule will govern Defendants' Motion for a Protective Order and Plaintiffs' response thereto:

EPA's Motion for a Protective Order – December 14, 2017

Plaintiffs' Response to Motion – January 2, 2017

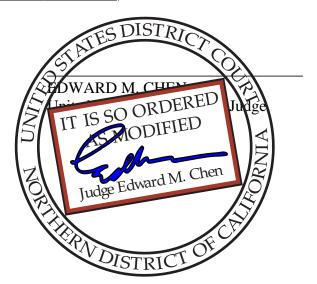
EPA's Reply – January 11, 2018

Updated Joint Case Management Conference Statement – January 18

Hearing and Further Case Management Conference – January 25, 2018 (1:30 pm)

## PURSUANT TO STIPULATION IT IS SO ORDERED.

DATED this \_\_\_5th\_ day of \_\_December \_\_\_\_\_, 2017.



CASE No. 17-CV-02162-EMC

STIPULATION TO EXTEND DEADLINES FOR EPA'S MOTION FOR PROTECTIVE ORDER BRIEFING SCHEDULE AND [PROPOSED] ORDER

## **CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by Notice of Electronic Filing this 5th day of December, 2017, upon all ECF registered counsel of record using the Court's CM/ECF system.

/s/ Michael Connett

MICHAEL CONNETT Attorney for Plaintiffs

CASE No. 17-CV-02162-EMC

STIPULATION TO EXTEND DEADLINES FOR EPA'S MOTION FOR PROTECTIVE ORDER BRIEFING SCHEDULE AND [PROPOSED] ORDER