

1 TRENT W. ORR, CA Bar No. 77656
 torr@earthjustice.org
 2 IRENE V. GUTIERREZ, CA Bar No. 252927
 igutierrez@earthjustice.org
 3 Earthjustice
 50 California Street, Suite 500
 4 San Francisco, CA 94111
 Telephone: (415) 217-2000
 5 Facsimile: (415) 217-2040

6 Attorneys for Plaintiffs

7
 8 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 9 SAN FRANCISCO DIVISION

10 PEOPLE OF THE STATE OF CALIFORNIA;

11 Plaintiff,

12 v.

13 UNITED STATES DEPARTMENT OF
TRANSPORTATION, et al.,

14 Defendants.

Case No. 02-CV-4621-KAW

JOINT STIPULATION TO EXTEND TIME TO
RESPOND TO ORDER TO SHOW CAUSE and
~~PROPOSED~~ ORDER AS MODIFIED

Judge: Hon. Kandis A. Westmore

16 SIERRA CLUB, et al.,

17 Plaintiffs,

18 v.

19 UNITED STATES DEPARTMENT OF
TRANSPORTATION, et al.,

20 Defendants.

Case No. 02-CV-4623-KAW

1 WHEREAS, on September 18, 2015, Defendants U.S. Department of Transportation and
2 Federal Aviation Administration filed a motion to dissolve the permanent injunction issued in this
3 matter on April 28, 2003;

4 WHEREAS, Plaintiffs did not file an opposition to the motion or a statement of non-
5 opposition as required by the Civil Local Rules by the deadline of October 2, 2015;

6 WHEREAS, this Court issued an Order to Show Cause on December 9, 2015, requesting that
7 Plaintiffs file either (1) a statement of non-opposition to the motion to dissolve the injunction, or (2)
8 show cause why the motion should not be granted as unopposed and file an opposition to the motion
9 to dissolve the injunction;

10 WHEREAS, Trent Orr is the lead attorney handling this matter on behalf of Plaintiffs Sierra
11 Club, National Parks Conservation Association, California Wilderness Coalition, and Natural
12 Resources Defense Council and is the main point of contact for these clients;

13 WHEREAS, Mr. Orr has been out of the office and without email since December 8, 2015,
14 and will not return until January 8, 2016;

15 THEREFORE, in light of Mr. Orr's absence, the Parties have agreed that Plaintiffs may have
16 until January 18, 2016, to respond to this Court's Order to Show Cause.

17 Respectfully submitted,

18 DATED: December 29, 2015

/s/ Irene V. Gutierrez
IRENE V. GUTIERREZ

*Counsel for Plaintiffs Sierra Club, National Parks
Conservation Association, California Wilderness
Coalition, Natural Resources Defense Council*

22 /s/ Jamie B. Jefferson (authorized 12/29/15)
JAMIE B. JEFFERSON

Counsel for Plaintiff State of California

25 /s/ Davene D. Walker (authorized 12/29/15)
DAVENE D. WALKER

27 *Counsel for Defendants U.S. Department of
Transportation and Federal Aviation Administration*

1 **~~PROPOSED~~ ORDER**

2 It is hereby ordered that Plaintiffs shall have until January 19, 2016, to respond to this
3 Court's Order to Show Cause.

4 IT IS SO ORDERED.

5
6 DATED: 12/30/15

7 
8 HON. KANDIS A. WESTMORE
9 UNITED STATES MAGISTRATE JUDGE