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 9 INTERNATIONAL ORGANIZATION OF MASTERS,
 10 MATES, AND PILOTS, PACIFIC MARITIME REGION

11 **UNITED STATES DISTRICT COURT**
 12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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14 INTERNATIONAL ORGANIZATION OF)	Case No. C-06-2107-CW
15 MASTERS, MATES, AND PILOTS,)	
16 PACIFIC MARITIME REGION,)	STIPULATION AND ORDER
)	EXTENDING DEADLINE AND
17 Plaintiff,)	SETTING BREIFING SCHEDULE
)	FOR MOTION FOR ATTORNEYS
18 v.)	FEES AND COSTS AS MODIFIED
)	
19 NATIONAL PARK SERVICE, et al.,)	
)	
20 Defendants.)	
)	

21 _____
 22
 23 Plaintiff International Organization of Masters, Mates and Pilots, Pacific Maritime
 24 Region (“MM&P”) and Defendants National Park Service and its Director (“Defendants”), by
 25 through their respective counsel, stipulate and agree as follows:

26 WHEREAS, MM&P intends to seek attorneys fees and costs from Defendants in this
 27 action in view of the stipulated judgment entered by the Court on June 19, 2009;
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1 WHEREAS, under the Local Rules of this Court, Plaintiff's motion for attorneys fees and
2 costs must be filed no later than July 3, 2009;

3 WHEREAS, the parties are meeting and conferring in an effort to resolve the attorneys
4 fee dispute without a motion, but the parties require additional time to try to reach an agreement;

5 NOW THEREFORE, the parties stipulate and agree that MM&P shall have until July 17,
6 2009 to move for attorneys' fees and costs; Defendants shall have until July 27, 2009 to file a
7 response, and Plaintiff shall have until August 7, 2009 to file a reply.
8

9 Respectfully submitted,

10 DATED: June 24, 2009

11 LEONARD CARDER, LLP
12 ROBERT S. REMAR
13 ELEANOR MORTON

14 By: /s/ Eleanor Morton
15 Eleanor Morton
16 Attorneys for Plaintiff MM&P

17 DATED: June 24, 2009

18 JOSEPH R. RUSSONIELLO
19 United States Attorney

20 /s/ Stephen Johnston
21 STEPHEN JOHNSTON
22 Assistant United States Attorney
23 Attorneys for Federal Defendants

24 PURSUANT TO STIPULATION, IT IS SO ORDERED. **THE MOTION WILL BE
25 DECIDED ON THE PAPERS.**

26 6/30/09



27 HON. CLAUDIA WILKEN
28 United States District Judge