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12 Attorneys for Defendants  
CHEVRON U.S.A. INC. and  
13 CHEVRON CORPORATION

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
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17 NORTHERN CALIFORNIA RIVER  
WATCH, a non-profit corporation,

18 Plaintiff,

19 v.

20 CHEVRON U.S.A.INC., CHEVRON  
CORPORATION, and DOES 1 - 10,  
21 Inclusive

22 Defendants.  
23 \_\_\_\_\_/

CASE NO.: 4:09-cv-00669 CW

**STIPULATION RE MODIFICATION OF  
CASE MANAGEMENT ORDER;  
ORDER  
[L.R. 6-2]**

Case Mgmt Conf. September 22, 2011

24 This Stipulation by and between the parties to the above-named action is requesting a  
25 modification of the Court's Minute Order and Case Management Order of April 6, 2010,  
26 (Court Doc # 31).

27 WHEREAS, this action is a complaint for injunctive relief, civil penalties and restitution  
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1 brought against Chevron U.S.A. Inc. and Chevron Corporation for current and ongoing  
2 violations of the Clean Water Act ( 33 U.S.C. § 1251 et seq.) and the Resources Conservation  
3 and Recovery Act (42 U.S.C. § 6901 et seq.) The action was filed on February 13, 2009; and

4 WHEREAS, following the filing of the Complaint, Plaintiff alleges that it discovered  
5 three additional sites which Plaintiff believes are continuing to violate provisions of RCRA;  
6 and,

7 WHEREAS, on or about April 5, 2010, Plaintiff served a 90-day Notice of Violations  
8 under RCRA upon Defendants Chevron U.S.A. Inc. and Chevron Corporation, as well as their  
9 counsel of record, alleging RCRA violations at these additional sites; and,

10 WHEREAS, before Plaintiff can initiate proceedings against Defendants as to these  
11 additional three sites, Plaintiff is required to observe the jurisdictional notice period and  
12 requirement to wait at least 90 days, until approximately July 5, 2010; and,

13 WHEREAS, Plaintiff believes it to be a more efficient and considerate use of judicial  
14 time and resources to extend the deadline for adding additional parties and claims to the existing  
15 complaint; and,

16 WHEREAS, Defendants do not object the modification to the Case Management Order  
17 that Plaintiff has requested, although by this Stipulation Defendants are not consenting to the  
18 addition of parties or claims and will meet and confer with Plaintiff on that issue as the Court  
19 instructed at the Initial Case Management Conference;

20 WHEREFORE, the parties stipulate and request that this Court modify the current Case  
21 Management Order by extending the deadline to add additional parties or claims to July 15,  
22 2010.

23 Dated: June 22, 2010

*/s/ Robert C. Goodman*  
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ROBERT C. GOODMAN  
Attorney for Defendants  
CHEVRON U.S.A. INC. and  
CHEVRON CORPORATION

26 In addition to stipulating to the above, I, Jack Silver, attest that concurrence in the filing  
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1 of this Stipulation has been obtained from the other signatory to this document.

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Dated: June 22, 2010

/s/ Jack Silver  
JACK SILVER  
Attorney for Plaintiff  
NORTHERN CALIFORNIA RIVER WATCH

**ORDER**

PER STIPULATION OF THE PARTIES AND GOOD CAUSE APPEARING, the request for modification of the Case Management Order is GRANTED.

The Case Management Order is modified as follows:

Deadline to add additional parties or claims shall be July 15, 2010.

Dated: 6/23/2010

  
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CLAUDIA WILKIN  
UNITED STATES DISTRICT JUDGE