1	Deborah A. Sivas (Calif. Bar No. 135446)				
2	Robb W. Kapla (Calif. Bar No. 238896) ENVIRONMENTAL LAW CLINIC				
3	Mills Legal Clinic at Stanford Law School Crown Quadrangle				
4	559 Nathan Abbott Way				
5	Stanford, California 94305-8610 Telephone: (650) 723-0325 Facsimile: (650) 723-4426 dsivas@stanford.edu				
6					
7	rkapla@law.stanford.edu				
8	Attorneys for Plaintiffs				
9	Turtle Island Restoration Network and Mayport Village Civic Association Inc.				
10					
11	UNITED STATES DISTRICT COURT				
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION				
13					
14	TURTLE ISLAND RESTORATION)	Case No. 4:09-cv-05239 CW			
15	NETWORK, a non-profit corporation; and) MAYPORT VILLAGE CIVIC ASSOCIATION)				
16	INC., a non-profit corporation,	STIPULATION AND ORDER RE EXTENSION OF BRIEFING			
17	Plaintiffs,	AND HEARING DATES			
18	v.)				
19	UNITED STATES DEPARTMENT OF	Hearing Date: April 29, 2010 Time: 2:00 pm			
20	STATE,	Location: Courtroom 2, 4 th Floor			
21	Defendant.				
22					
23	Plaintiffs Turtle Island Restoration Network and Mayport Village Civic Association and				
24	Defendant U.S. Department of State ("Parties") hereby stipulate to extend the remaining briefing				
25	schedule and continue the noticed hearing for Defendant's Motion for Judgment on the Pleadings and				
26	request that the Court enter an order directing a revised schedule as set forth below.				
27	The circumstances warranting a short extension of the briefing dates and a short continuance of				
28	the noticed hearing date are as follows:				
	Case No. 4:09-cv-05349 CW STIPULATION AND [PROPOSED] ORDER RE EXTENSION OF BRIEFING AND HEARING DATES				

- 1. The original deadline for Defendant's responsive pleading was January 4, 2010. The parties stipulated to extend that deadline until February 19, 2010, on the understanding that they would work out a mutually acceptable briefing schedule if Defendant chose to file a motion to dismiss.
- 2. On February 19, 2010, Defendant filed its answer. The initial case management conference in this matter is currently scheduled for May 4, 2010.
 - 3. On March 19, 2010, Defendant filed a Motion for Judgment on the Pleadings.
- 4. Plaintiffs are represented by the Stanford Environmental Law Clinic, which relies upon certified law students, working under the direct supervision of licensed attorneys, to perform most of the legal work for its clients. March 19, 2010 was the final day of the winter academic quarter, which was followed by a ten-day spring break. Thus, clinic students did not return to campus and classes until March 29, 2010, and could not begin work on the Motion for Judgment on the Pleadings until that time.
- 5. The parties have agreed to extend the briefing dates in order to allow clinical students to work on the pending Motion for Judgment on the Pleadings and to allow Defendant an additional week for preparation of its reply brief beyond the normal briefing schedule.
- 6. Accordingly, the parties stipulate to, and request that the Court order, the following new briefing and hearing dates.

	<u>Current Date</u>	New Date
Opposition Brief	April 8, 2010	May 6, 2010
Reply Brief	April 15, 2010	May 20, 2010
Hearing	April 29, 2010	June 3, 2010

7. The proposed extension will not prejudice any party or result in significant delay.

DATED: April 12, 2010 Respectfully submitted,

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Facsimile: (650) 723-4426 dsivas@stanford.edu

Attorneys for Plaintiffs

/s/ Deborah A. Sivas

DEBORAH A. SIVAS Environmental Law Clinic

559 Nathan Abbott Way

Stanford, California 94305-8610 Telephone: (650) 723-0325

Mills Legal Clinic of Stanford Law School

1	DATED: April 12, 2010	IGNACIA S. MORENA
2		Assistant Attorney General Environment & Natural Resources Division
3		/s/ Kevin W. McArdle
4		KEVIN W. McARDLE, Trial Attorney
5		United States Department of Justice Environment & Natural Resources Division
6		Wildlife and Marine Resources Section
7		Benjamin Franklin Station, P.O Box 7369 Washington, D.C. 20044-7369
8		Tel: (202) 305-0219 Fax: (202) 305-0275
9		E-mail: <u>kevin.mcardle@usdoj.gov</u>
10		Attorneys for Defendant
11		
12	Pursuant to Stipulation, IT IS SO ORDERED.	O
13	DATED: 4/23/2010	aidialent
14		HON. CLAUDIA WILKEN United States District Judge
15		•
16		
17	1	concurrence in this filing, indicated by the signature of ned" signature ("/s/") within this e-filed document.
18	DATED: April 12, 2010	/s/ Deborah A. Sivas
19	1 ,	DEBORAH A. SIVAS
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