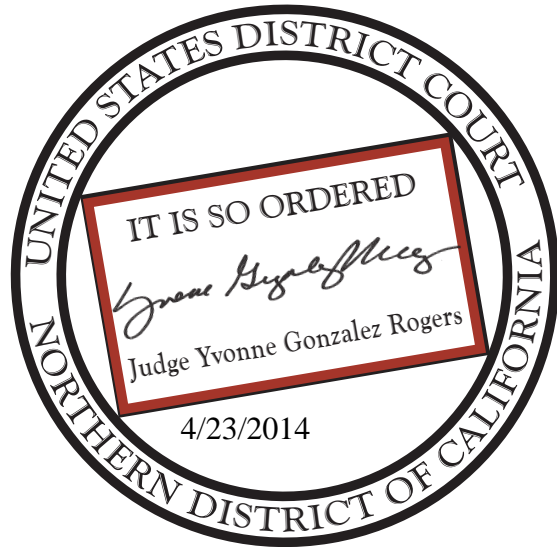


1 ROBERT G. DREHER
 2 Acting Assistant Attorney General
 3 Environment & Natural Resources Division
 4 NORMAN L. RAVE, JR. (D.C. 431602)
 5 Environmental Defense Section
 6 Environment & Natural Resources Division
 7 United States Department of Justice
 8 P.O. Box 7611
 9 Washington, D.C. 20044
 10 TEL: (202) 616-7568
 11 FAX: (202) 514-8865
 12 e-mail: norman.rave@usdoj.gov



13 [Counsel for Plaintiffs listed on signature page]

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

17 CENTER FOR BIOLOGICAL DIVERSITY,)
 18 GREENPEACE, INC., and PORT)
 19 TOWNSEND AIRWATCHERS,)

Case No.: C-11-06059 YGR

20 Plaintiffs,

21 v.

**JOINT NOTICE THAT CONSENT
 DECREE OBLIGATIONS HAVE BEEN
 FULFILLED**

22 UNITED STATES ENVIRONMENTAL)
 23 PROTECTION AGENC,Y et al.,)

24 Defendants.)

25 **JOINT NOTICE THAT CONSENT DECREE
 OBLIGATIONS HAVE BEEN FULFILLED**

26 In accordance with Paragraph 15 of the Consent Decree, DE 46, Defendants United
 27 States Environmental Protection Agency, and Gina McCarthy, Administrator, in her official
 28 capacity, (collectively "EPA") and Plaintiffs Greenpeace, Inc., Port Townsend Airwatchers, and
 Center for Biological Diversity, hereby provide notice that EPA has fulfilled the requirements of
 Paragraphs 2 and 3 of the Consent and that Plaintiffs' claims for cost of litigation have been

1 resolved. Specifically, the EPA Administrator signed proposed and final rules by the dates
2 specified in Paragraph 2 of the Consent Decree and the proposed and final rules were submitted
3 to the Office of Federal Register as required by Paragraph 3. The final rule has now been
4 published in the Federal Register. 79 Fed. Reg. 18,952 (April 4, 2014). In addition, Plaintiffs'
5 claims for costs of litigation were resolved by settlement pursuant to the process described in
6 Paragraph 6 of the Consent Decree.

7 Accordingly, as provided in Paragraph 15 of the Consent Decree, the Consent Decree is
8 terminated, this case may be dismissed with prejudice, and the case may be closed.

9 Respectfully submitted,

10
11 ROBERT G. DREHER
12 Acting Assistant Attorney General
13 Environment & Natural Resources Division

14 /S Norman L. Rave, Jr.
15 NORMAN L. RAVE, JR. (D.C. 431602)
16 Environmental Defense Section
17 Environment & Natural Resources Division
18 United States Department of Justice
19 P.O. Box 7611
20 Washington, D.C. 20044
21 TEL: (202) 616-7568
22 FAX: (202) 514-8865
23 norman.rave@usdoj.gov

24 Attorneys for EPA

25 /S Helen Kang
26 HELEN KANG(State Bar No. 124730)
27 Environmental Law and Justice Clinic
28 Golden Gate University School of Law
536 Mission Street
San Francisco, CA 94105
Telephone: 415.442.6647
Facsimile: 415.896.2450
hkang@ggu.edu

Attorney for Plaintiffs GREENPEACE, INC. and
PORT TOWNSEND AIRWATCHERS

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/S Vera P. Pardee
VERA P. PARDEE (State Bar No. 106146)
KEVIN BUNDY (State Bar No. 231686)
Center for Biological Diversity
351 California Street, Suite 600
San Francisco, CA 94104
Telephone: 415.436.9682 ext. 317
Facsimile: 415.436.9683
vpardee@biologicaldiversity.org

Attorneys for Plaintiff CENTER FOR
BIOLOGICAL DIVERSITY

April 16, 2014

