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11 Attorneys for Plaintiffs
 RESOURCE RENEWAL INSTITUTE,
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 and WESTERN WATERSHEDS PROJECT
 13

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

17 RESOURCE RENEWAL INSTITUTE,
 CENTER FOR BIOLOGICAL
 18 DIVERSITY, and WESTERN
 WATERSHEDS PROJECT,
 19

Plaintiffs,

20 v.

21 NATIONAL PARK SERVICE, a federal
 22 agency, and CICELY MULDOON, in her
 official capacity as Superintendent of Point
 23 Reyes National Seashore,
 24

Defendants.

Case No. 4:16-cv-00688-SBA (KAW)

**STIPULATION AND [PROPOSED] ORDER
 TO TEMPORARILY STAY LITIGATION
 AND EXTEND PENDING DEADLINES**

Judge: Hon. Sandra Brown Armstrong

Date Filed: February 10, 2016

Trial Date: None set

1 Pursuant to N.D. Cal. Local Civil Rules 6-1, 6-2, 7-2, 7-3, and 7-4, Plaintiffs RESOURCE
2 RENEWAL INSTITUTE, CENTER FOR BIOLOGICAL DIVERSITY, and WESTERN
3 WATERSHEDS PROJECT, and Defendants NATIONAL PARK SERVICE, and CICELY
4 MULDOON IN HER OFFICIAL CAPACITY AS SUPERINTENDENT OF POINT REYES
5 NATIONAL SEASHORE (collectively, the “Parties”), through undersigned counsel hereby jointly
6 stipulate and respectfully request that the Court: (1) stay the case until October 17, 2016; and (2)
7 extend by three weeks the pending deadlines for the Case Management Conference and statement, and
8 Plaintiffs’ Reply in Support of Their Motion for Preliminary Injunctive Relief. The Parties jointly
9 declare in support of these stipulated requests:

10 A. WHEREAS, the Court entered an Order on July 22, 2016, referring the above-
11 captioned action for a mandatory settlement conference (the “Settlement Conference”) (ECF No. 55)
12 with Hon. Judge Donna M. Ryu (ECF No. 67) on September 20, 2016 (ECF No. 72);

13 B. WHEREAS, the Parties and representatives for the Intervenor KEVIN and NANCY
14 LUNNY, RICHARD and JACKIE GROSSI, TED and RHEA MCISSAC, GINO LUCCHESI JR and
15 CLATON LUCCHESI, MIKE and MORGAN GIAMONN, RICHARD GALLAGHER, RALPH and
16 LUKE GIACOMINI, FRED and GINNY ROGERS, LOUIS and WYATT ZANARDI, and
17 PAULETTE PERCY (“the Lunny Ranchers”) and JULIE EVANS ROSSOTTI, DAVID and
18 DOLORES EVANS, ROBERT McCLURE, TIM, TOM, and MIKE KEHOE, NICHOLA, ERNIE,
19 and ERNEST SPALETTA, BETTY NUNES, and WILLIAM and NICOLETTE NIMAN (the
20 “Rossotti Ranchers”) and the COUNTY OF MARIN (collectively, “the Intervenor”) participated in
21 the Settlement Conference on September 20, 2016, and agreed to deadlines regarding next steps (ECF
22 No. 112);

23 C. WHEREAS, the Court entered an Order on August 11, 2016, directing the parties to file
24 a joint status report informing the Court as to the outcome of the mandatory settlement conference
25 (ECF No. 80);

26 D. WHEREAS, the Court entered an Order on September 2, 2016, setting an October 12,
27 2016, due date for Plaintiffs’ Reply in Support of their Motion for Preliminary Injunctive Relief (ECF
28 No. 96) and continuing the hearing on Plaintiffs’ Motion for Preliminary Injunctive Relief to

1 November 9, 2016;

2 E. WHEREAS, the Court re-set the due dates for the Case Management Statement to
3 October 12, 2016, and for the Case Management Conference to October 19, 2016 (ECF No. 80);

4 F. WHEREAS, the Parties believe that a three-week stay of the litigation and an extension
5 of these pending deadlines will conserve judicial resources, save the Parties' time and expenses, and
6 allow the Parties to focus on the deadlines set during the Settlement Conference;

7 G. WHEREAS, Plaintiffs may seek to further extend the due date for their Reply in order
8 to obtain further production of information from the Defendants, and the Parties agree that Plaintiffs
9 are not waiving their right to seek such an extension by entering into this stipulation, and that they
10 shall not be prejudiced by entering into this stipulation;

11 H. WHEREAS, the Parties agree that by entering into this stipulation Defendants shall not
12 be prejudiced and are not waiving their right to object to any motion by Plaintiffs to supplement the
13 Administrative Record, to seek any form of discovery, or to extend the due date for their reply brief in
14 order to obtain further production of information from Defendants;

15 I. WHEREAS, Counsel for Intervenors Rosetti Ranchers, Lunny Ranchers, and Marin
16 County have each stated they do not oppose the Parties' request to stay the litigation as described
17 herein;

18 NOW THEREFORE, pursuant to N.D. Cal. Local Civil Rules 6-1, 6-2, 7-2, 7-3, and 7-4, the
19 Parties through their respective attorneys stipulate and jointly request that the Court:

- 20 1. Stay the case until October 17, 2016;
- 21 2. Extend the pending due date for Plaintiffs' Reply in Support of Their Motion for
22 Preliminary Injunctive Relief by three weeks from its current date to November 2, 2016, extend the
23 Case Management Conference and statement, by at least three weeks from their current due dates or as
24 appropriate based on the Court's calendar, and continue the hearing date for Plaintiffs' Motion for
25 Preliminary Injunctive Relief to December 14, 2016; and
- 26 3. Order the Parties to file a joint status report on October 17, 2016, informing the Court
27 whether they believe a further stay would be appropriate at that time.

28 SO STIPULATED AND AGREED.

1 Dated: September 26, 2016

KEKER & VAN NEST LLP

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3 By: /s/ Jeffrey R. Chanin
JEFFREY R. CHANIN
4 DAVID W. RIZK

5 /s/ Elizabeth H. Zultoski
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1 Dated: September 26, 2016

UNITED STATES ATTORNEY'S OFFICE

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26 Attorneys for Defendants
27 NATIONAL PARK SERVICE, and
28 CICELY MULDOON IN HER OFFICIAL
CAPACITY AS SUPERINTENDENT OF
POINT REYES NATIONAL SEASHORE

19 **CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES**

20 I, Elizabeth H. Zultoski, am the ECF user whose ID and password are being used to file this
21 Stipulation. In compliance with N.D. Cal. Civ. L.R. 5-1(i)(3), I hereby attest that each of the
22 signatories has concurred in the filing of this document and has authorized the use of his or her
23 electronic signature.

24 Dated: September 26, 2016

/s/ Elizabeth H. Zultoski
Elizabeth H. Zultoski

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 27, 2016

Saundra B. Armstrong
SAUNDRA BROWN ARMSTRONG
Senior United States District Judge

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