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11 Attorneys for Defendants

12
 13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 CENTER FOR BIOLOGICAL DIVERSITY,)
 et alia,)
 16) Case No. 2:13-cv-1785-RFB-GWF
 Plaintiffs,)
 17)
 v.)
 18)
 TOM VILSACK, in his official capacity as)
 19 Secretary of the U.S. Department of)
 Agriculture;)
 20 et alia,)
 21 Defendants.)

22 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION**
 23 **OF SUMMARY JUDGMENT BRIEFING DEADLINES**
 (Second Request)

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1 The parties – Plaintiffs Center for Biological Diversity, Maricopa Audubon Society, and Dr.
2 Robin Silver and Defendants Tom Vilsack, Gregory Parham, Sally Jewell, and Dan Ashe, in their
3 official capacities – hereby jointly submit this stipulation stating as follows:

4 1. On December 8, 2014, this Court approved a Joint Stipulation of the parties extending
5 summary judgment briefing deadlines by one week. Doc. 27. Pursuant to that stipulation Defendants’
6 combined cross-motion for summary judgment and opposition to Plaintiffs’ motion for summary
7 judgment is presently due February 20, 2015. Doc. 27. In their stipulation, the parties agreed that “in
8 the event that changed circumstances necessitate revisions to this schedule, the parties will confer and
9 jointly propose a revised schedule for the Court’s review and approval or otherwise seek amendment
10 upon a showing of good cause.” Id. ¶ 4. Plaintiffs filed their Motion for Summary Judgment on
11 December 22, 2014. Doc. No 28.

12 2. On February 11, 2015, Defendants’ lead counsel conferred with Plaintiffs’ counsel to request
13 a one-week extension for filing Defendants’ opening summary judgment brief, through and including
14 February 27, 2015, based on unanticipated intervening briefs in other cases and personal obligations, as
15 well as a need for additional time to coordinate the review of Defendants’ filing with the multiple
16 Defendants. Plaintiffs’ counsel consented to the one-week extension, with the request that the
17 subsequent briefing deadlines in the case be extended as well to account for other professional
18 obligations and good cause shown.

19 3. Accordingly, counsel for all parties stipulate that good cause exists for an extension in this
20 matter, and respectfully request that the Court approve the following proposed briefing schedule:

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Action	New Date
Defendants shall file their combined cross-motion for summary judgment and opposition to Plaintiffs’ motion for summary judgment	February 27, 2015

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1	(50 pages)	
2	Plaintiffs shall file their combined opposition and reply to Defendants' cross-motion (30 pages)	April 8, 2015
3		
4	Defendants shall file their reply (20 pages)	May 14, 2015

5 4. The parties agree that, in the event that further changed circumstances or good cause
6 necessitates further revision to this schedule, the parties will confer and jointly propose a further
7 revised schedule for the Court's review and approval.

8 Respectfully submitted this 12th day of February, 2015.

9
10 JOHN C. CRUDEN
Assistant Attorney General

11 /s/ John H. Martin
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24 /s/ by permission given 2/12/15
25 William S. Eubanks II
(D.C. Bar No. 987036)
26 (Admitted Pro Hac Vice)

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Attorneys for Plaintiffs

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED: March 2, 2015.

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Proof of Service

I, John H. Martin certify that the following individuals were served with this Stipulation on this date by the below identified method of service:

Electronic Case Filing:

William S. Eubanks II - beubanks@meyerglitz.com

Eric R. Glitzenstein - eglitzenstein@meyerglitz.com

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DATED this 12th day of February 2015.

/s/ John Martin
John H. Martin
Trial Attorney