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Attorneys for the Federal Defendants

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 _____)
 BASIN AND RANGE WATCH,)
 18 Plaintiff,)
 19 v.)
 20 BUREAU OF LAND MANAGEMENT)
 AND THE U.S. DEPARTMENT OF THE)
 21 INTERIOR,)
 22 Defendants.)
 23 _____)

Civil Action No.: 2:16-cv-00403 JCM-PAL

JOINT MOTION FOR STAY PENDING SETTLEMENT

24 Plaintiff Basin and Range Watch and Defendants Bureau of Land Management and U.S.

25 Department of the Interior submit this joint request that this matter be stayed for 30 days to allow the
 26 parties time to pursue settlement.

1 This case arises out of Plaintiff's Freedom of Information Act (FOIA) requests to the Federal
2 Defendants. In responding to the FOIA requests, the Federal Defendants withheld some information
3 pursuant to FOIA's Exemption Four. Plaintiff brought this action seeking disclosure of the information
4 and alleging that the Federal Defendants failed to comply with FOIA.

5 The Federal Defendants filed their Motion for Summary Judgment on July 5, 2016. ECF# 20.
6 Plaintiff filed its Response and Countermotion on August 9, 2016. ECF## 21, 25. Pursuant to the
7 briefing scheduled entered by this Court, ECF 19, the Federal Defendants' combined summary judgment
8 reply and cross-motion response is due September 20, 2016, and Plaintiff's cross-motion reply is due by
9 October 21, 2016.

10 Due to a change in position by the submitter of the information withheld under Exemption Four,
11 the Federal Defendants recently determined that they will disclose all information responsive to
12 Plaintiff's original FOIA requests. The Federal Defendants agree that they will produce this information
13 on or before September 26, 2016. The parties now believe they can resolve this matter without further
14 litigation.

15 Accordingly, the parties respectfully request that this matter be stayed for 30 days to allow the
16 parties to discuss settlement of this matter. The parties request that the Court set a status hearing 30 days
17 from the entry of this Order, by which time the parties will either file a stipulation dismissing this action
18 or submit a new proposed scheduling order to complete briefing on the pending motions.

19 Respectfully submitted this 20th day of September 2016.

20 DANIEL G. BOGDEN
21 United States Attorney

22 /s/ Troy K. Flake
Troy K. Flake
23 Assistant United States Attorney
Of Attorneys for Federal Defendants

/s/ David A. Bahr
DAVID A. BAHR, ESQ., *Pro Hac Vice*
24 Of Attorneys for Plaintiff

25 It is so ordered.

26 Date: September 22, 2016

Jerry A. Green
United States Magistrate Judge