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20 (List of Counsel continued on next page)

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 CENTER FOR BIOLOGICAL DIVERSITY,
21 SIERRA CLUB, COUNTY OF SANTA
22 CRUZ, and COUNTY OF MONTEREY,

22 Plaintiffs,

23 v.

24 U.S. BUREAU OF LAND MANAGEMENT,
25 et al.,

26 Defendants.

Civ. No. 3:19-cv-07155-JSC

**STIPULATION TO EXTEND STAY OF
THE CASE FOR 60 DAYS**

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1 Pursuant to Civil L.R. 6-2, Plaintiffs Center for Biological Diversity, Sierra Club, County of
2 Santa Cruz and County of Monterey (collectively, “Plaintiffs”), and Defendants the Bureau of Land
3 Management and Debra Haaland, in her official capacity as Secretary of the United States
4 Department of the Interior (collectively, “Defendants”), having conferred through their respective
5 counsel, hereby stipulate to an extension of the stay of this case for 60 days. This extension will
6 allow for the parties to continue settlement discussions.

7 This is the eighth extension sought in this case. The first extension was to allow Plaintiffs to
8 file an amended complaint; the second was to allow Defendants additional time to lodge the
9 administrative record; the third was to allow the parties to complete the administrative record
10 without further motions; the fourth was to allow for Defendants’ internal review of the case; the
11 fifth was to allow for Defendants to continue that review; and the sixth and seventh were to stay the
12 case for settlement discussions.

13 During the stay period, the Parties have engaged in fruitful settlement discussions and have
14 exchanged multiple settlement proposals. Most recently, Defendants responded to Plaintiffs’
15 counteroffer on December 17, 2021. Plaintiffs are currently reviewing Defendants’ response. Given
16 holiday schedules, and County Board of Supervisors winter breaks, additional time is needed to
17 allow Plaintiffs time to complete that review and the Parties time to discuss the proposal.

18 The parties respectfully request that the current stay in the case be extended 60 days, until
19 March 21, 2022 under Civil L.R. 1-5(c) and Fed. R. Civ. P. 6(a)(1)(C). Should further litigation be
20 necessary, the parties will provide the Court with a proposed briefing schedule by March 21, 2022.

21
22
23 DATED: December 29, 2021

Respectfully submitted,

24 TODD KIM
25 Assistant Attorney General
26 Environment & Natural Resources Division
United States Department of Justice

27 /s/ Leilani Doktor
28 LEILANI E. DOKTOR,
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6 Attorneys for Defendants

7 *As the ECF User whose identification and password are being used to file this Stipulation, I attest
8 under penalty of perjury that co-counsel for Plaintiffs and counsel for Defendants have concurred in
9 the filing of this document.*

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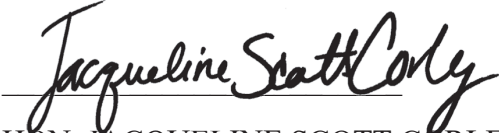
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Counsel for County of Santa Cruz

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED:

- 1. The stay in this case is extended for 60 days, until March 21, 2022.
- 2. If further litigation is necessary, the parties will submit a proposed schedule by March 21, 2022.

Dated: December 30, 2021


 HON. JACQUELINE SCOTT CORLEY
 United States Magistrate Judge

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