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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
3 Land 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 ninth 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 through eighth were to stay
12 the 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, Plaintiffs responded to Defendants’
15 counteroffer in February 2022. Defendants are currently reviewing Plaintiffs’ response. At this
16 point, the parties are near agreement on the substantive terms and are drafting an agreement in
17 principle. Additional time is needed to allow for drafting of the agreement and for the parties to
18 review the document and obtain approvals.

19 The parties respectfully request that the current stay in the case be extended 60 days, until
20 May 20, 2022 under Civil L.R. 1-5(c) and Fed. R. Civ. P. 6(a)(1)(C). Should further litigation be
21 necessary, the parties will provide the Court with a proposed briefing schedule by May 20, 2022.
22
23

24 DATED: March 16, 2022

Respectfully submitted,

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

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

9 BRENDAN CUMMINGS (CA Bar No. 193952)
10 /s/ Elizabeth Jones
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ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED:

1. The stay in this case is extended for 60 days, until May 20, 2022.
2. If further litigation is necessary, the parties will submit a proposed schedule by May 20, 2022.

Dated: March 17, 2022



HON. JACQUELINE SCOTT CORLEY
United States Magistrate Judge