

JEFFREY H. WOOD

Acting Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division
TYLER L. BURGESS, DC Bar No. 1025617
Natural Resources Section
PO Box 7611
Washington, DC 20044-7611
(202) 616-4119
tyler.burgess@usdoj.gov

SETH M. BARSKY, Chief
S. JAY GOVINDAN, Assistant Chief
ANDREA GELATT, Cal. Bar No. 262617
Wildlife & Marine Resources Section
PO Box 7611
Washington, DC 20044-7611
(202) 305-0210
andrea.gelatt@usdoj.gov

Attorneys for Federal Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

CONSERVATION CONGRESS,	)	No. 2:13-CV-01977-JAM-DB
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER
v.	)	MODIFYING BRIEFING
	)	SCHEDULE
	)	
UNITED STATES FOREST SERVICE and	)	
UNITED STATES FISH AND WILDLIFE	)	Hon. John A. Mendez
SERVICE,	)	
	)	
Federal Defendants,	)	
	)	
and	)	
	)	
TRINITY RIVER LUMBER CO.,	)	
	)	
Defendant-Intervenor.	)	

Pursuant to Local Rules of the U.S. District Court for the Eastern District of California 143 and 144, the undersigned parties hereby stipulate to the following adjustments to the briefing schedule on Plaintiff's Memorandum Brief as to the Appropriate Remedy for Violation of the National Environmental Policy Act (Amended Version), ECF No. 125:

Brief	Current Date	New Date
Federal Defendants' Response Brief	March 20, 2017	March 23, 2017
Defendant-Intervenor's Response Brief	March 27, 2017	March 30, 2017
Plaintiff's Reply Brief	April 10, 2017	April 17, 2017

The changes are requested in order to accommodate Federal Defendants' request for additional time beyond the deadline of March 20, 2017, in order to have adequate time to prepare their response in light of counsel's case commitments and recent absence from the office for medical reasons. This is Defendant's first request for an extension to file its response brief, but the second adjustment to the briefing schedule for this motion. See ECF Nos. 122-23 (granting Plaintiff's Unopposed Motion to Adjust Deadlines for filing of Briefs on Appropriate Remedy).

Accordingly, the parties request the Court approve this Stipulation, and enter the proposed changes to the briefing schedule.

Respectfully submitted this 20th day of March, 2017.

/s/ Steven Sugarman (by TLB as authorized 3/20/2017)

STEVEN SUGARMAN (pro hac vice)
347 County Road 55A
Cerrillos, NM 87010
(505) 672-5082
stevensugarman@hotmail.com

Attorney for Plaintiff

JEFFREY H. WOOD
Acting Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division

/s/ Tyler L. Burgess
TYLER L. BURGESS, DC 1025617
Trial Attorney
Natural Resources Section
PO Box 7611
Washington, DC 20044-7611

(202) 616-4119
tyler.burgess@usdoj.gov

SETH M. BARSKY, Chief
S. JAY GOVINDAN, Assistant Chief
ANDREA GELATT, Cal. Bar No. 262617
Trial Attorney
Wildlife & Marine Resources Section
PO Box 7611
Washington, DC 20044-7611
(202) 305-0210
andrea.gelatt@usdoj.gov

Attorneys for Federal Defendants

/s/ Lawson E. Fite (by TLB as authorized
3/20/2017)

LAWSON E. FITE, pro hac vice
American Forest Resource Council
5100 S.W. Macadam, Suite 350
Portland, OR 97239
(503) 222-9505
lfite@amforest.org

Attorney for Defendant-Intervenor

The Court having considered the Stipulation of the parties, **IT IS SO ORDERED.**

Dated: 3/21/2017

/s/ John A. Mendez
Hon. John A. Mendez
United States District Court Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 20, 2017, I filed the foregoing document electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Tyler L. Burgess
Tyler L. Burgess
U.S. Department of Justice