

Kristine M. Akland
Center for Biological Diversity
P.O. Box 7274
Missoula, MT 59807
Phone: (406) 544-9863
kakland@biologicaldiversity.org

Camila Cossío, *admitted pro hac vice*
Center for Biological Diversity
P.O. Box 11374
Portland, OR 97211
Phone: (971) 717-6727
ccossio@biologicaldiversity.org

Collette L. Adkins, *admitted pro hac vice*
Center for Biological Diversity
P.O. Box 595
Circle Pines, MN 55014-0595
Phone: (651) 955-3821
cadkins@biologicaldiversity.org

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

**CENTER FOR BIOLOGICAL
DIVERSITY,**

Plaintiff,

v.

**U.S. FISH AND WILDLIFE
SERVICE, et al.,**

Defendants.

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) Case No. CV-21-144-DWM
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) **JOINT MOTION TO STAY**
) **PROCEEDINGS**
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Plaintiff Center for Biological Diversity and Federal Defendants the United States Fish and Wildlife Service; Martha Williams, in her official capacity as Principal Director of the Service; Department of the Interior; and Deb Haaland, in her official capacity as Secretary of the Interior, hereby jointly request that this Court stay all deadlines in this matter until April 8, 2022.

The parties are engaged in settlement communications and believe settlement is possible and therefore request a joint stay of proceedings to engage in further discussions. A stay would conserve the parties' and the Court's resources and is within the Court's discretion. *See Johnson v. Inos*, 619 Fed. Appx. 651, 652 (9th Cir. 2015). The parties will file a joint status report before the stay expires, on April 1, 2022, to update the Court on the status of the parties' settlement discussions. At that time, the parties will either request an extension of the stay or propose amended case management deadlines.

The stay would postpone three deadlines established by the Court in its November 29, 2021 Case Management Order (ECF Doc. 3): (1) Federal Defendants' obligation to submit an Answer to Plaintiff's Complaint by February 7, 2022; (2) the parties' obligation to submit a preliminary pretrial statement by February 14, 2022; and (3) the parties' obligation to submit a proposed case management plan by February 28, 2022.

For the foregoing reasons, the parties jointly and respectfully request entry of the proposed order attached.

DATED: February 7, 2022

/s/ Camila Cossío

Camila Cossío, *admitted pro hac vice*
Center for Biological Diversity
P.O. Box 11374
Portland, OR 97211
Phone: (971) 717-6727
ccossio@biologicaldiversity.org

/s/ Collette L. Adkins

Collette L. Adkins, *admitted pro hac vice*
Center for Biological Diversity
P.O. Box 595
Circle Pines, MN 55014-0595
Phone: (651) 955-3821
Fax: (510) 844-7150
cadkins@biologicaldiversity.org

/s/ Kristine M. Akland

Kristine M. Akland
Center for Biological Diversity
P.O. Box 7274
Missoula, MT 59807
Phone: (406) 544-9863
kakland@biologicaldiversity.org

Attorneys for Plaintiff

TODD KIM, Assistant Attorney General
SETH M. BARSKY, Chief
S. JAY GOVINDAN, Assistant Chief

/s/ Kaitlyn Poirier

KAITLYN POIRIER, Trial Attorney (TN Bar # 034394)

U.S. Department of Justice

Environment and Natural Resources Division

Wildlife and Marine Resources Section

Ben Franklin Station, P.O. Box 7611

Washington, D.C. 20044-7611

(202) 307-6623 (tel)

(202) 305-0275 (fax)

kaitlyn.poirier@usdoj.gov

Attorneys for Defendants