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8 Attorneys for Defendants

9
 10 IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 Central Sierra Environmental Resource)
 12 Center, The Wilderness Society, and)
 Public Employees for Environmental)
 13 Responsibility,)

14 Plaintiffs,)

15 v.)

16 United States Forest Service, an agency)
 of the Dept. of Agriculture,)
 17 Susan Skalski, in her official capacity as)
 Forest Supervisor of the Stanislaus)
 18 National Forest, and Randy Moore, in)
 his official capacity as Regional Forester)
 19 U.S. Forest Service, Pacific Southwest)
 Region,)

21 Federal Defendants,)

22 and)

23 California Ass'n of Four Wheel Drive)
 Clubs, et al.,)

24 Defendant Intervenors.)
 25)

Civil No. 10-02172-KJM-GGH

STIPULATION OF
 DISMISSAL PURSUANT TO
 FED. R. CIV. P. 41(a);
 [PROPOSED] ORDER

Date: n/a
 Time: n/a
 Place: n/a
 Judge: Hon. Kimberly J. Mueller

1 To effectuate the Stipulated Settlement Agreement entered into by the Parties, the Parties
2 do hereby agree and stipulate to the dismissal of this action with prejudice pursuant to Fed. R.
3 Civ. P. 41(a). The Parties agree that this Court shall retain jurisdiction of this matter until the
4 Settlement Agreement is terminated solely for the limited purpose of determining compliance
5 with the Settlement Agreement. *See Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375
6 (1994). Notwithstanding the preceding sentence, the Parties agree that any challenge to the
7 procedures used or the conclusions drawn by the Forest Service to comply with the Court's
8 Order (2013 WL 7749 *15, 16) to demonstrate its application of the 2005 Travel Management
9 Rule Subpart B minimization criteria, 36 C.F.R. § 212.55(b), to the 2009 Decision as set forth in
10 paragraph 1 of the Settlement Agreement shall be brought in a newly filed complaint rather than
11 as a continuation of this action.
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17 May 23, 2014

Respectfully submitted,

18 Sam Hirsch
Acting Assistant Attorney General

19 /s/ Cynthia S. Huber
20 Cynthia S. Huber
Assistant Section Chief
21 Natural Resources Section
Environment and Natural Resources Division
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25 Counsel for Federal Defendants
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/s/ Gregory C. Loarie (with permission)
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Counsel for Defendant Intervenors_____

IT IS SO ORDERED. This matter is hereby dismissed with prejudice.

Dated: _____
Hon. Kimberly J. Mueller

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2014, I electronically transmitted the Stipulated Settlement Agreement (including Attachment A), Stipulation of Dismissal and Proposed Order, using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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/s/ Cynthia S. Huber
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