

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TODD KIM  
Assistant Attorney General  
Environment & Natural Resources Division

LEILANI DOKTOR, admitted to HI Bar  
E-Mail: leilani.doktor@usdoj.gov  
150 M Street NE  
Washington, D.C. 20002  
Tel: (202) 305-0447 / Fax: (202) 305-0506  
leilani.doktor@usdoj.gov

CLARE BORONOW, admitted to MD bar  
999 18th St., South Terrace, Suite 370  
Denver, CO 80202  
Tel: (303) 844-1362 / Fax: (303) 844-1350  
clare.boronow@usdoj.gov  
*Attorneys for Defendants*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

	)	
CENTER FOR BIOLOGICAL DIVERSITY, et al.,	)	Case No. 2:20-cv-00371-DSF
	)	[consolidated with Case No. 2:20-cv-00504-PSG]
Plaintiffs,	)	
v.	)	<b>STIPULATION OF DISMISSAL</b>
	)	<b>PURSUANT TO COMPROMISE</b>
	)	<b>SETTLEMENT AGREEMENT</b>
	)	<b>[FRCP 41(a)]</b>
	)	<b>AND PROPOSED ORDER OF</b>
	)	<b>DISMISSAL</b>
U.S. BUREAU OF LAND MANAGEMENT, et al.,	)	
	)	
Defendants.	)	
	)	

Plaintiffs Center for Biological Diversity et al. in case No. 2:20-cv-00371-DSF-SS (C.D. Cal., filed Jan. 14, 2020), Plaintiff State of California in case No. 2:20-cv-00504-PSG-AS (consolidated April 2, 2020, ECF No. 18), and Federal Defendants, the United States

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Bureau of Land Management et al. (“BLM”), hereby stipulate under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) that this action be dismissed with prejudice, pursuant to the terms of the attached Stipulated Settlement Agreement (Attachment 1). Upon dismissal of this action, the Parties agree that this Court shall retain jurisdiction solely for the purposes of enforcing the Settlement Agreement, subject to the limitations described in Paragraphs 14 and 15 of the Settlement Agreement. *See Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994).

DATED: July 31, 2022

TODD KIM  
Assistant Attorney General  
Environment & Natural Resources Division

/s/ Leilani Doktor  
LEILANI DOKTOR, admitted to HI Bar  
United States Department of Justice  
150 M Street NE  
Washington, D.C. 20002  
Tel: (202) 305-0447  
Fax: (202) 305-0506  
leilani.doktor@usdoj.gov

/s/ Clare Boronow  
CLARE BORONOW, admitted to MD bar  
999 18th St., South Terrace, Suite 370  
Denver, CO 80202  
Tel: (303) 844-1362  
Fax: (303) 844-1350  
clare.boronow@usdoj.gov

*Attorneys for Defendants*

/s/ Michelle Ghafar  
MICHELLE GHAFAR (CA Bar No. 315842)  
mghafar@earthjustice.org  
Earthjustice  
50 California Street, Suite 500

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

San Francisco, CA 94111  
Tel: (415) 217-2000 / Fax: (415) 217-2040

ELIZABETH FORSYTH (CA Bar No. 288311)  
eforsyth@earthjustice.org  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
Tel: (213) 766-1067 / Fax: (415) 217-2040

*Counsel for National Parks Conservation Association,  
Natural Resources Defense Council, and The Wilderness  
Society*

/s/ Elizabeth Jones  
ELIZABETH JONES (CA Bar No. 326118)  
ljones@biologicaldiversity.org  
BRENDAN CUMMINGS (CA Bar No. 193952)  
bcummings@biologicaldiversity.org  
Center for Biological Diversity  
1212 Broadway, Suite 800  
Oakland, CA 94612  
Tel: (310) 365-9281 / Fax: (510) 844-7150

*Counsel for Center for Biological Diversity, Central  
California Environmental Justice Network, Los Padres  
ForestWatch, Patagonia Works, and Sierra Club*

/s/ George Torgun  
GEORGE TORGUN, SBN 222085  
YUTING YVONNE CHI, SBN 310177  
Deputy Attorneys General  
1515 Clay Street, 20th Floor  
P.O. Box 70550  
Oakland, CA 94612  
Tel: (510) 879-1002  
Fax: (510) 622-2270  
George.Torgun@doj.ca.gov  
Yvonne.Chi@doj.ca.gov

*Attorneys for the State of California*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION OF CONCURRENCE**

In accordance with Local Rule 5-4.3.4, I hereby attest that all counsel whose signature is listed, and on whose behalf this e-filed document is submitted, concur in the filing’s content and have authorized the filing.

/s/ Leilani Doktor  
Leilani Doktor