

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

CENTER FOR INTERNATIONAL ENVIRONMENTAL LAW,)	Civil Action No. 01 CV 00498 (RWR)
)	
Plaintiff,)	
)	
v.)	
)	
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE, <i>et al.</i> ,)	
)	
Defendants.)	

**JOINT STIPULATION AND REQUEST TO EXTEND TIME
FOR FILING MOTION FOR FEES**

Plaintiff the Center for International Environmental Law (“CIEL”) and Defendants Office of the United States Trade Representative and Ambassador Ron Kirk, in his official capacity as the United States Trade Representative (collectively “USTR”), by and through their respective attorneys of record, hereby stipulate as follows:

On February 29, 2012 this Court entered an order (Doc. 57) denying USTR’s second renewed motion for summary judgment (Doc. 50), granting CIEL’s cross-motion for summary judgment (Doc. 51), enjoining the USTR from withholding Document 1, and closing the case. This order represents final judgment in the case.

Pursuant to Rule 4(b) of the Federal Rules of Appellate Procedure, USTR has 60 days within which to file a notice of appeal. The deadline for USTR to file a notice of appeal is thus April 30, 2012.

CIEL intends to move for recovery of costs and attorneys' fees pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and Local Rules 54.1 and 54.2 of the Local Rules of the U.S. District Court for the District of Columbia. According to Federal Rule 54(d), CIEL must file its motion for fees no later than 14 days after entry of judgment, or by March 14, 2012.

USTR has not yet determined whether to appeal the February 29 judgment. The parties agree and hereby stipulate that, for purposes of judicial economy and efficiency, resolution of costs and fees should be stayed pending any appeal by USTR. Therefore, the parties stipulate and request that the Court extend the deadline for CIEL to file its motion for fees until 14 days after the deadline for USTR to file a notice of appeal, or May 14, 2012; and in the event that USTR does file a notice of appeal, the parties stipulate and request that the deadline be further extended until 14 days after the Court of Appeals issues its mandate in USTR's appeal.

Respectfully submitted,

Dated: March 12, 2012

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Dated: March 12, 2012

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Defendants.)	
)	

[PROPOSED] ORDER

The deadline for plaintiff to file a motion for recovery of costs and fees pursuant to Rule 54(d) of the Federal Rules of Civil Procedure, and Local Rule 54.1 and 54.2 is hereby extended until May 14, 2012. In the event that defendant files a notice of appeal, the deadline is hereby further extended until 14 days after the Court of Appeals issues its mandate in the appeal.

IT IS SO ORDERED.

March ____, 2012

Honorable Richard W. Roberts
United States District Judge