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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

WESTERN WATERSHEDS PROJECT,	)	Civ. No. 06-277-BLW
	)	
Plaintiff,	)	
	)	<b>UNOPPOSED MOTION TO</b>
v.	)	<b>EXTEND DEADLINE IN</b>
	)	<b>AMENDED JOINT STIPULATION</b>
U.S. FISH AND WILDLIFE SERVICE,	)	<b>ON REMAND</b>
	)	
Defendant.	)	
	)	
_____	)	

Pursuant to the May 29, 2009 Amended Stipulation on Remand (Dckt. No. 183) entered into between Plaintiff WESTERN WATERSHEDS PROJECT (“WWP”) and Defendant U.S. FISH & WILDLIFE SERVICE (“the Service”) and approved by the Court (Dckt. No. 184), the Service is required to submit its new 12-month finding on greater sage-grouse to the Federal Register for publication by February 26, 2010. Amend. Stip. at 4, ¶ 3. The Amended Stipulation provides, however, that “if highly unusual and unforeseen circumstances arise that make it

impossible or imprudent for the Service to submit the 12-month finding to the Federal Register by the February 26, 2010 deadline, then WWP and the Service will confer on a further extension of those deadlines.” *Id.* at 5, ¶ 4.

On Saturday, February 20, 2010, the Director of the Service, Sam Hamilton, died suddenly while skiing in Colorado. Funeral Services for Mr. Hamilton are scheduled to be held in Atlanta, Georgia on February 24, 2010, and will be widely-attended by Service officials who otherwise would be working to complete the new 12-month finding on greater sage grouse. Undersigned counsel for Federal Defendant has conferred with counsel for WWP, Laird Lucas, who has authorized undersigned counsel to represent to the Court that WWP does not oppose a one-week extension of the deadline for the new 12-month finding in light of the circumstances.

Wherefore, Federal Defendant respectfully requests that the Service be granted until March 5, 2010 to submit its new 12-month finding to the Federal Register.

Dated: February 22, 2010

Respectfully submitted,

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/s/ Robert P. Williams  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 22<sup>nd</sup> day of February, 2010, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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