

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

STAND UP FOR CALIFORNIA!, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF INTERIOR,
et al.,

Defendants.

Civil Case No. 1:17-cv-00058
(RDM)

[PROPOSED] ORDER

This matter having come before the Court on Plaintiffs' Motion to Complete and/or Supplement the Administrative Record and Memorandum in Support, the Court having fully considered the Motion, the Declaration of Odin Smith, and the files, records, and pleadings in this case,

IT IS HEREBY ORDERED THAT:

1. Plaintiffs' Motion is GRANTED.
2. Defendants shall conduct a complete review of its agency files, including email correspondence involving key decision-makers and the environmental contractor to ensure that all relevant documents have been compiled.
3. No later than _____, 2018, Defendants shall produce a complete administrative record that includes the documents Plaintiffs identified as missing from the administrative record, all such responsive documents with improper redactions removed and all segregable factual information produced, and all documents improperly excluded or withheld as deliberative process.
4. For every relevant document Defendants withhold based on any asserted privilege or protection, Defendants shall list each document on a privilege log with detail

sufficient to allow Plaintiffs and the Court to evaluate the sufficiency of Defendants' claim. Defendants shall file such privilege log no later than _____, 2018.

5. Upon receipt of Defendant's complete administrative record, Plaintiffs shall have 30 days to file any objections to defendants' assertions of privilege or request for in camera review of withheld or redacted documents.

Entered this _____ day of _____, 2018.

United States District Judge Moss

Presented by:

PERKINS COIE LLP

/s/ Jennifer A. MacLean

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