

**Peter M. Lacy (“Mac”) (OSB # 01322)**  
Oregon Natural Desert Association  
917 SW Oak Street, Suite 408  
Portland, OR 97205  
(503) 525-0193  
lacy@onda.org

**Kristin F. Ruether (OSB # 05368)**  
Advocates for the West  
P.O. Box 1612  
Boise, ID 83701  
(208) 342-7024  
kruether@advocateswest.org

Attorneys for Plaintiffs

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

**OREGON NATURAL DESERT ASS’N and  
WESTERN WATERSHEDS PROJECT,**

Plaintiffs,

Case No. 06-1311-MO

v.

**PLAINTIFFS’ STATUS REPORT**

**CAROLYN FREEBORN**, Field Manager,  
Jordan Resource Area, BLM, **DAVE  
HENDERSON**, Vale District Manager, BLM,  
**BUREAU OF LAND MANAGEMENT,**  
and **UNITED STATES DEPARTMENT  
OF THE INTERIOR,**

Defendants.

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Plaintiffs Oregon Natural Desert Association and Western Watersheds Project  
(collectively referred to as “ONDA”) file this status report pursuant to the Court’s order (Dkt #  
42) directing the parties to file such report by this date. ONDA files this report to notify the

Court that the parties have discussed and are working on a new stipulation similar to the one entered on February 28, 2007 (Dkt # 25, Stipulation to Avoid Motion for Preliminary Injunction). Because certain terms of the February 2007 stipulation have expired, it is necessary for the parties to enter into a new agreement to avoid another motion for preliminary injunctive relief aimed at maintaining the status quo while BLM performs its additional wilderness analysis.

On February 4, 2008, ONDA notified BLM that plaintiffs would like to renew the 2007 stipulation. On February 15, 2008, ONDA conferred with BLM concerning plaintiffs' intention to file a motion for preliminary injunctive relief that would "ask the court to enjoin BLM from further authorization or implementation of the LCGMA rangeland projects and from further use of certain already-constructed projects, as well as ordering the agency to maintain existing projects sufficiently to avoid environmental injury pending a decision on the merits." BLM responded on February 18, 2008 that it is willing to enter into a new stipulation that extends the terms of the 2007 stipulation. Counsel for ONDA prepared a draft and sent it to counsel for BLM for defendants' review, on February 20, 2008. Defendants have not yet responded.

ONDA expects, per these communications with defendants' counsel, that the parties will enter into the above-described stipulation. However, if the parties are not able to resolve this issue in a timely fashion, ONDA respectfully notifies the Court and defendants that plaintiffs will seek injunctive relief as described above.

DATED this 3d day of March, 2008

Respectfully Submitted,

s/ Peter M. Lacy

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Oregon Natural Desert Association

Of Attorneys for Plaintiffs