

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
CONSERVATION LAW FOUNDATION,)	
INC.)	
)	
	Plaintiff,)	
)	
v.)	Case No. 1:16-cv-00493-SM
)	
PEASE DEVELOPMENT AUTHORITY,)	
et al)	
)	
	Defendants.)	
_____)	

Joint Notice of Settlement, Lodging of Settlement Agreement Pending DOJ Review, and Request for Stay of Deadlines

The Parties hereby respectfully provide notice to the Court that they have settled the above-captioned matter and lodge the attached fully-executed Settlement Agreement, pending the conclusion of the 45-day review period established by the Clean Water Act and its regulations. 33 U.S.C. 1251 *et seq.* and 40 C.F.R. 135.5(b).

Plaintiff’s undersigned counsel will send copies of the fully-executed Settlement Agreement to the Administrator, Environmental Protection Agency (“EPA”), Washington, DC 20460, as well as to the United States Department of Justice (“DOJ”), Citizen Suit Coordinator, Environment and Natural Resources Division Law and Policy Section, P.O. Box 7415, Ben Franklin Station, Washington, D.C. 20044-7415

The Parties submit the attached Settlement Agreement to the Court for informational purposes only. At the expiration of the 45-day review period set forth in 33 U.S.C. § 1365(c)(3) and the satisfaction of the terms outlined in Paragraph 32 of the attached Settlement Agreement,

the Parties will jointly move the Court dismiss the above-captioned matter, with prejudice, pursuant to Fed. R. Civ. P. 41.

In light of the Parties' negotiated resolution of this matter, and their intention to jointly move this Court to dismiss this matter with prejudice after the 45-day review period set forth in 33 U.S.C. § 1365(c)(3) and satisfaction of the terms set out in Paragraph 32 of the Settlement Agreement, the Parties respectfully request that this Honorable Court stay all pending deadlines in this case.

Respectfully submitted,

CONSERVATION LAW FOUNDATION, INC.

Dated: January 11, 2019

By its attorneys,

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PEASE DEVELOPMENT AUTHORITY AND INDIVIDUAL DEFENDANTS

Dated: January 11, 2019

By their attorneys,

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CERTIFICATE OF E-SERVICE

I hereby certify that the Parties' foregoing document, filed electronically through the ECF system with the Court on January 11, 2019, has been sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on January 11, 2019.

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