

Order (Mar. 2, 2021). The new Secretary of the Interior, Debra Haaland, was confirmed on March 15, 2021 and sworn in on March 18, 2021. On April 6, 2021, Defendants filed a Consent Motion to Amend the Schedule, asking for a two-week extension of all deadlines to allow new administration officials at the Department of the Interior more time to evaluate the agency's approach to surgical sterilization under the decision at-issue in this case, BLM's October 2020 Confusion HMA Decision. ECF No. 10. On April 12, 2021, the Court granted the Consent Motion and extended all deadlines by two weeks. Minute Order (Apr. 12, 2021).

After undertaking the evaluation that the prior extensions were designed to facilitate, BLM presently has no intention to surgically sterilize wild mares using "ovariectomy via colpotomy" under BLM's October 2020 Confusion HMA Decision. Accordingly, the parties seek a stay in this litigation to allow BLM time to formalize that position. The parties have conferred and agreed to a stay of all proceedings until June 21, 2021. The parties further agree that, if BLM ultimately decides to implement "ovariectomy via colpotomy" sterilization of mares in the Confusion HMA under the challenged October 2020 Confusion HMA Decision, the parties should retain the same opportunities for reviewing the administrative record and briefing the relevant issues that they have already agreed on. In such event, the parties will confer and propose a new schedule for the Court's approval.

For the foregoing reasons and for good cause shown, the parties respectfully request that the Court grant the motion to stay all proceedings until June 21, 2021. A proposed order is attached.

Dated: April 20, 2021

Respectfully submitted,

/s/ William N. Lawton

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to the attorneys of record.

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