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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 AMY GRANAT; CORKY LAZZARINO; SIERRA )  
ACCESS COALITION; CALIFORNIA OFF-ROAD )  
12 VEHICLE ASSOCIATION; THE COUNTY OF )  
PLUMAS; and THE COUNTY OF BUTTE, )

13 Plaintiffs, )  
14

15 v. )

16 UNITED STATES DEPARTMENT OF )  
AGRICULTURE, a federal agency; TOM VILSACK, )  
in his official capacity as Secretary of the UNITED )  
17 STATES DEPARTMENT OF AGRICULTURE; )  
UNITED STATES FOREST SERVICE, a federal )  
18 agency; THOMAS L. TIDWELL, in his official )  
capacity as Chief of the UNITED STATES FOREST )  
19 SERVICE; RANDY MOORE, in his official capacity )  
as PACIFIC SOUTHWEST REGIONAL FORESTER; )  
20 ALICE CARLTON, in her official capacity as the )  
former PLUMAS NATIONAL FOREST )  
21 SUPERVISOR; and EARL FORD, in his official )  
capacity as PLUMAS NATIONAL FOREST )  
22 SUPERVISOR, )

23 Defendants.  
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No. 2:15-cv-00605-MCE-EFB  
(TEMP)

**NOTICE OF MOTION AND  
MOTION TO COMPEL  
INCLUSION OF CERTAIN  
DOCUMENTS AS PART OF THE  
ADMINISTRATIVE RECORD**

Date: February 17, 2016  
Time: 10:00 a.m.  
Courtroom: 8, 13th Floor  
Judge: Hon. Magistrate  
Judge Edmund F. Brennan

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1 **TO FEDERAL DEFENDANTS AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that on February 17, 2016, at 10:00 a.m., before the Honorable  
3 Magistrate Judge Edmund F. Brennan, at the Robert T. Matsui Federal Building, 501 I Street, 13th  
4 Floor, Courtroom 8, Sacramento, California, the Plaintiffs will and hereby do move, pursuant to  
5 the Court's Scheduling Order dated August 11, 2015 (Doc. 20), that the following documents be  
6 included in the official Administrative Record to be filed with this Court by the Federal  
7 Defendants, because such documents include important information crucially relevant to the  
8 Plaintiffs in connection with the issues raised in this case:

9 (1) Any and all Light Detection and Ranging Data ("LiDar") in the possession of the Forest  
10 Service and associated watercourses and Hillshade products in Plumas National Forest, comprised  
11 of approximately 15 DVDs;

12 (2) A publication in the possession of the Federal Defendants titled, "A Short Introduction  
13 to Liar: What is it and how can we use it?"

14 (3) Electronic GPS data in the possession of the Federal Defendants regarding route  
15 inventory field data collected by United States Forest Service crews and contractors between  
16 2006 - 2009 as part of the Plumas National Forest route designation process; and

17 (4) "Semi-Primitive Nonmotorized" data, which is an early data set with a map attached,  
18 setting forth the underlying data/information that was used to create the GIS data generated by the  
19 Federal Defendants, consisting of the original letter, data, maps, and other documentation used to  
20 create maps in the 1988 Plumas National Forest Land Management Plan.

21 As set forth in detail in the Felker Declaration, filed herewith, the items that Plaintiffs  
22 request to be included in the Administrative Record are important to support the claims made by  
23 the Plaintiffs in that the documentation shows that the data used by the Federal Defendants in  
24 designating routes for motorized travel in connection with the Environmental Impact Statement  
25 and the Record of Decision are flawed and incorrect.

26 This motion is based on this Notice of Motion and Motion, the Memorandum of Points and  
27 Authorities, the Felker Declaration and its exhibits, the Court's files and records, and any oral  
28 argument at the hearing on the motion.

1 DATED: January 19, 2016.

2 Respectfully submitted,

3 THEODORE HADZI-ANTICH  
4 M. REED HOPPER

5 By           /s/ THEODORE HADZI-ANTICH            
6 THEODORE HADZI-ANTICH

7 Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on January 19 , 2015, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of California through the Court's CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Court's CM/ECF system.

/s/ THEODORE HADZI-ANTICH  
THEODORE HADZI-ANTICH

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