

1 Deborah A. Sivas (CA Bar # 135446)
2 Holly D. Gordon (CA Bar # 226888)
3 STANFORD LAW SCHOOL ENVIRONMENTAL LAW CLINIC
4 559 Nathan Abbott Way
5 Stanford, CA 94305-8620
6 Telephone: (650) 723-0325
7 Facsimile: (650) 725-8509
8 Email: dsivas@stanford.edu

5 Lisa T. Belenky (CA Bar # 203225)
6 CENTER FOR BIOLOGICAL DIVERSITY
7 1095 Market St., Suite 511
8 San Francisco, CA 94103
9 Telephone: (415) 436-9682 x307
10 Facsimile: (415) 436-9683
11 Email: lbelenke@biologicaldiversity.org

9 Brendan R. Cummings (CA Bar # 193952)
10 CENTER FOR BIOLOGICAL DIVERSITY
11 P.O. Box 549
12 Joshua Tree, CA 92252
13 Telephone: (760) 366-2232
14 Facsimile: (760) 366-2669
15 Email: bcummings@biologicaldiversity.org

12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT FOR THE
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

17 CENTER FOR BIOLOGICAL DIVERSITY,) Case No: C-03-2509-SI
18 SIERRA CLUB, PUBLIC EMPLOYEES FOR)
19 ENVIRONMENTAL RESPONSIBILITY, and)
20 DESERT SURVIVORS,)

19 Plaintiffs,)

20 v.)

21 BUREAU OF LAND MANAGEMENT and)
22 U.S. FISH AND WILDLIFE SERVICE,)

22 Defendants.)

Case No: C-03-2509-SI

**PLAINTIFFS' BRIEF REGARDING
REMEDY**

1 **I. Introduction**

2 On March 14, 2006, the Court issued an Opinion and Order resolving the parties' Cross-Motions for
3 Summary Judgment ("2006 Opinion"). The Court found that defendants Bureau of Land Management
4 ("BLM") and U.S. Fish and Wildlife Service ("FWS") violated the Endangered Species Act ("ESA"), 16
5 U.S.C. §§ 1531, et seq., the National Environmental Policy Act ("NEPA"), 42 U.S.C. §§ 4321, et seq., and
6 the Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. §§ 1701, et seq., in taking actions
7 related to the management of Imperial Sand Dunes Recreation Area ("ISDRA") and the two threatened
8 species that occur there, the desert tortoise and the Peirson's milk-vetch. The Court requested further
9 briefing from the parties regarding the appropriate form of relief. The parties attempted to reach through
10 negotiations a stipulation concerning relief which would obviate the need for the Court to rule on the issue.
11 Unfortunately, the parties were unable to reach final agreement on such a stipulation. Plaintiffs therefore
12 respectfully request that the Court grant the relief as described below and in the accompanying Proposed
13 Order. Plaintiffs believe that the requested relief is fair, equitable, consistent with the Court's 2006 Opinion,
14 and within the Court's jurisdiction to order and enforce. Furthermore, Plaintiffs believe that the requested
15 relief will preserve the environmental status quo and protect the unique resources of the Algodones Dunes
16 while allowing off-road vehicle ("ORV") use to continue in those portions of the ISDRA in which it is
17 currently allowed. In short, Plaintiffs seek an order from this Court vacating and/or remanding the various
18 final agency actions of BLM and FWS while maintaining the "temporary closures" which have been in place
19 for over six years. The specific details of Plaintiffs' requested relief are explained further below.

20 **II. BLM's 2005 Record of Decision and Accompanying Documents Must be Vacated**

21 In the 2006 Opinion the Court found BLM to have violated the ESA, NEPA and FLPMA in its
22 issuing of the 2005 Record of Decision ("2005 ROD") approving the 2003 ISDRA Recreation Area
23 Management Plan ("2003 RAMP"). Specifically, the Court found that BLM violated Section 7 of the ESA,
24 16 U.S.C. § 1536(a)(2), by arbitrarily and capriciously relying upon the conclusions of the January 2005
25 Biological Opinion ("2005 BiOp") for the 2003 RAMP prepared by FWS. See Opinion at 31 ("the BLM's
26 reliance on the legally inadequate 2005 BO was in error."). Additionally, the Court held that BLM violated
27 NEPA by failing to analyze the Interim Management Alternative as a reasonable alternative and by failing
28 to analyze the effects of the 2003 RAMP on the endemic invertebrates of the Dunes. See Opinion at 53-58

1 and 58-64. Finally, the Court held that BLM violated FLPMA by arbitrarily and capriciously approving the
2 2003 RAMP without a current inventory of the endemic invertebrates of the Dunes and by seeking to reopen
3 the closed areas without making a legally adequate finding pursuant to 43 C.F.R. § 8341.2(a) that “the
4 adverse effects [which lead to the closure] have been eliminated and measures implemented to prevent
5 recurrence.” See Opinion at 64-67. Each of these violations standing alone would provide a sufficient basis
6 for the Court to vacate the ROD and the RAMP; collectively, they mandate such a result.

7 It is well-established that the ordinary remedy when an agency violates the law that the action be
8 vacated and remanded to the agency for further proceedings. See Federal Election Comm'n v. Akins, 524
9 U.S. 11, 25, 118 S. Ct. 1777, 141 L. Ed. 2d 10 (1998) (“If a reviewing court agrees that the agency
10 misinterpreted the law, it will set aside the agency's action and remand the case”); see also Alsea Valley
11 Alliance v. Department of Commerce, 358 F.3d 1181, 1185 (9th Cir. 2004) (“Although not without exception,
12 vacatur of an unlawful agency rule normally accompanies a remand.”); Idaho Farm Bureau Federation v.
13 Babbitt, 58 F.3d 1392, 1405 (9th Cir. 1995) (“Ordinarily when a regulation is not promulgated in compliance
14 with the APA, the regulation is invalid”); Paulsen v. Daniels, 413 F.3d 999, 1008 (9th Cir. 2005) (same).

15 The Administrative Procedure Act (“APA”) itself requires such a result. The APA provides that a
16 court “shall hold unlawful and set aside agency action . . . found to be arbitrary, capricious, an abuse of
17 discretion, or otherwise not in accordance with law” or “without observance of procedure required by law.”
18 5 U.S.C. § 706(2)(A) & (D). The Ninth Circuit has also observed that “NEPA is a procedural statute, and
19 we have held that agency action taken without observance of the procedure required by law will be set aside.”
20 Idaho Sporting Congress Inc. v. Alexander, 222 F.3d 562, 567 (9th Cir. 2000); see also Thomas v. Peterson,
21 753 F.2d 754, 764 (9th Cir. 1985) (“Our cases repeatedly have held that, absent ‘unusual circumstances,’ an
22 injunction is the appropriate remedy for a violation of NEPA's procedural requirements.”).

23 Notwithstanding this well-settled law, BLM will likely argue that the Court should remand the ROD,
24 RAMP and FEIS without vacating these flawed documents. BLM will likely provide a laundry list of
25 purported benefits from allowing the agency to continue to implement the 2003 RAMP pursuant to the ROD.
26 Such “benefits” are either legally irrelevant, would not be impacted by vacatur of the ROD and RAMP, or
27 are outweighed by the harms from allowing these documents to remain legally operative. In any event, they
28 do not rise to the level of “unusual circumstances” which would be required to avoid vacatur.

1 As detailed in the merits briefing in this case, a primary harm from the 2003 RAMP as approved by
2 the ROD is the elimination of the existing Interim Closures. BLM cannot dispute that eliminating these
3 closures would harm the Peirson's milk-vetch and other rare species of the Dunes. Additionally, and highly
4 significant given the Court's finding related to BLM's violations of NEPA and FLPMA, the 2003 RAMP
5 is less protective of the endemic invertebrates at the Dunes than the 1987 RAMP it replaced. The 1987
6 RAMP and associated Habitat Management Plan ("HMP") required extensive invertebrate surveys and
7 monitoring prior to initiating various ground disturbing activities. See, e.g. ROD AR Sec.1 at 4347-51 (1987
8 RAMP survey requirements); BO AR Doc# 46 at 1485-86 (HMP monitoring requirement). The 2003 RAMP
9 does not contain any of these requirements. As this Court has previously stated in finding BLM in violation
10 of NEPA, "[h]ere, there is no indication from the EIS itself that the BLM considered the environmental
11 impact of the RAMP on the numerous endemic invertebrates that are known are likely to occur in the
12 Dunes." Opinion at 60.

13 In sum, remand and vacatur of the 2005 ROD, 2003 RAMP and FEIS are required by the law of this
14 Circuit and necessary and appropriate to effectuate the purposes of the ESA, NEPA and FLPMA.

15 **III. Portions of the 2005 Biological Opinion must be Remanded and Vacated**

16 In the 2006 Opinion the Court found FWS's January 2005 Biological Opinion ("2005 BiOp")
17 unlawful in several respects. Specifically, the Court found the 2005 BiOp's conclusions that the 2003 RAMP
18 would not jeopardize the Peirson's milk-vetch or destroy or adversely modify its critical habitat to be
19 arbitrary and capricious. See Opinion at 15-21 and 21-23. Additionally, the Court found the Incidental Take
20 Statement ("ITS") for the desert tortoise to be arbitrary and capricious because the ITS failed to specify the
21 amount or extent of take and because it failed to include terms and conditions to minimize the impacts of
22 ORVs on take. Opinion at 23-30. As discussed above with regard to BLM's ROD, Ninth Circuit law
23 requires remand and vacatur of agency actions found to be arbitrary and capricious. Moreover, in an earlier
24 stage of this case, this Court has already addressed this very issue and concluded that vacatur of a biological
25 opinion was appropriate.

26 In this case, equity does not demand departure or exception from the normal rule of vacatur.

27 It is unclear whether or how a proper adverse modification analysis will affect the biological
28 opinion regarding the desert tortoise, and the Court cannot predict what the new opinion will

1 conclude. Failing to vacate the biological opinion, thus allowing the CDCA Plan to go
2 forward *pendente lite*, might have irreversible consequences for the desert tortoise.

3
4 American Motorcyclist Association v Norton, 2004 U.S. Dist. LEXIS 15662 (N.D. Cal. 2004).

5 In this instance, Plaintiffs request that the Court vacate and remand those portions of the 2005 BiOp
6 relating to the Peirson's milk-vetch. With regard to the desert tortoise, Plaintiffs only challenged the ITS so
7 vacatur of the "no jeopardy" conclusion for the tortoise is not being sought.¹ While vacatur of the ITS would
8 be an appropriate remedy, Plaintiffs seek more narrowly-tailored relief. Vacatur of the ITS would render
9 BLM and any visitors to the Dunes without take authorization for any take which would likely occur from
10 continued ORV use in tortoise habitat. It is not Plaintiffs' intent to preclude all such ORV use pending
11 remand. A primary flaw of the ITS was its failure to quantify take. Plaintiffs believe an appropriate remedy
12 would be a remand allowing the take authorization provided by the ITS to continue during remand so long
13 as BLM complies with the terms and conditions of the ITS, and so long as observed or reported take does
14 not exceed a specified amount. See Proposed Order at Paragraph 3.

15 **IV. The Final Critical Habitat Designation for Peirson's Milk-vetch must be Remanded**

16 This Court found that FWS's exclusion of certain areas from the August 4, 2004 final designation
17 of critical habitat for the Peirson's milk-vetch, 69 Fed. Reg. 47,330 (Aug. 4, 2004) ("Final Rule"), to be
18 arbitrary and capricious. Specifically, the Court found FWS to have relied on an improper legal standard in
19 weighing the benefits of designation, and flawed economic analysis in calculating the costs of designation.
20 Opinion at 33-48. A remand of the Final Rule and accompanying economic analysis is therefore appropriate
21 to remedy these defects. Because the existing critical habitat designation, even if comprised of only half the
22 acreage that a lawful designation would contain, is substantially more protective to the Peirson's milk-vetch
23 than no such designation, Plaintiffs believe that the Final Rule should remain in place pending remand. See

24
25 _____
26 ¹ While Plaintiffs do not explicitly seek vacatur of the portions of the 2005 BiOp regarding the "no
27 jeopardy" finding for the desert tortoise, because the ROD and RAMP must otherwise be vacated, the
28 "action" on which BLM consults with FWS following the remand will be a different action likely
requiring a new consultation. Moreover, because a "no jeopardy" determination must be based upon the
"best available science", the conclusions of the 2005 BiOp regarding the tortoise will likely be outdated
by the time a new ROD is issued on remand.

1 NRDC v. U.S. Dept. of Interior, 275 F. Supp. 2d 1136, 1144 (C.D. Cal. 2002) (keeping critical habitat rule
2 in place pending remand).

3 While keeping the existing, though inadequate, critical habitat rule in place pending remand provides
4 some necessary protections for the Peirson's milk-vetch, it does not wholly remedy the problem. The Court
5 found that FWS unlawfully excluded over 30,000 acres of proposed critical habitat from the final
6 designation. The ESA provides some protections for proposed critical habitat. Specifically, Section 7(a)(4)
7 requires that "[e]ach Federal Agency shall confer with [FWS] on any agency action which is likely to
8 jeopardize the continued existence of any species proposed to be listed under section 1533 of this title or
9 result in the destruction or adverse modification of critical habitat proposed to be designated for such
10 species." 16 U.S.C. § 1536(a)(4). Prior to issuance of the flawed Final Rule, the areas of proposed critical
11 habitat which were subsequently excluded from the Final Rule received the protections of Section 7(a)(4).
12 Plaintiff therefore request that the Court reinstate the August 5, 2003 proposed designation of critical habitat
13 for the Peirson's milk-vetch, 68 Fed. Reg. 46143. Such action will ensure that these areas receive at least
14 some protection during the lengthy remand period.²

15 Finally, Plaintiffs request that the Court set a date certain for FWS to complete the new critical habitat
16 designation on remand. Court have consistently ordered FWS to complete a new or remanded critical habitat
17 designation by a date certain. See, e.g Forest Guardians v. Babbitt, 174 F.3d 1178, 1193 (10th Cir. 1999)
18 (collecting cases and comparing timelines mandated by various courts). In such cases timelines have ranged
19 from as little as 5 days to as long as two years. Id. In this case, the primary threat to the Peirson's milk-vetch
20 and its critical habitat is ORV use as authorized by the RAMP.³ So long as the Interim Closures remain in
21 effect (see discussion infra) that threat is largely abated. Therefore, acknowledging the heavy workload and
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23
24 ² Additionally, because the problems with the Final Rule stem from exclusions of areas contained in the
25 proposed rule, rather than any actual legal deficiencies in the proposed rule, by reinstating the proposed
26 rule, FWS need only complete a new economic analysis and conduct a weighing of the benefits and
costs pursuant to Section 4(b)(2). This will result in a substantial saving of time and resources over
starting the designation process from scratch.

27 ³ Such impacts are not the only threats the species faces. Border patrol activities and the lining and
28 maintenance of the All American Canal also affect the species. See 69 Fed. Reg. at 47342 (final critical
habitat rule describing threats to the species).

1 competing obligations of the Carlsbad office of FWS which would presumably prepare the new rule on
2 remand, Plaintiffs request a date of no later than December 1, 2007 for completion of a revised final rule on
3 remand. Such a date is eminently reasonable and well within the range set by courts in similar cases.

4 **V. The Interim Vehicle Closures Must Remain in Effect**

5 In their decade-long advocacy for the protection of the Algodones Dunes and the rare species that
6 inhabit live there, Plaintiffs have sought balanced management which protects the fragile and irreplaceable
7 resources of the Dunes yet allows ORV use to continue. For over six years the Dunes have been subject to
8 such balanced management. The 2005 ROD, 2005 BiOp, and 2003 RAMP would all have this management
9 changed to a scheme in which the vast majority of the Dunes would be subject to unlimited ORV use. While
10 caselaw in this Circuit would support the complete closure of the Dunes to ORV use pending BLM and
11 FWS's compliance with the ESA, NEPA, and FLPMA, Plaintiffs do not seek such a dramatic remedy.
12 Instead, the primary on-the-ground relief that Plaintiffs seek is to simply maintain the environmental status
13 quo and keep the current Interim Vehicle Closures in place pending the completion of a new ROD, RAMP,
14 EIS, BiOp and critical habitat designation. See Proposed Order at Paragraph 5.

15 BLM has violated the ESA, NEPA and FLPMA in approving a ROD and RAMP which would
16 eliminate the Interim Vehicle Closures. Each of these statutes provides authority for the Court to issue an
17 Order continuing the closures. It is well-settled law in this Circuit that upon finding a violation of the ESA,
18 an injunction is mandatory. See, e.g. Thomas v. Peterson, 753 F.2d 754, 764 (9th Cir. 1985) (“[G]iven a
19 substantial procedural violation of the ESA in connection with a federal project, the remedy must be an
20 injunction of the project pending compliance with the ESA.”); Washington Toxics Coalition v. EPA, 413
21 F.3d 1024, 1035 (9th Cir. 2005) (“It is well-settled that a court can enjoin agency action pending completion
22 of section 7(a)(2) requirements.”). Similarly, a violation of NEPA also should result in an injunction against
23 the agency action. See Thomas, 753 F.2d at 764 (“Our cases repeatedly have held that, absent ‘unusual
24 circumstances,’ an injunction is the appropriate remedy for a violation of NEPA's procedural requirements.
25 Irreparable damage is presumed to flow from a failure properly to evaluate the environmental impact of a
26 major federal action.”)(internal citations omitted). With regard to FLPMA violations, this Court has already
27 found that any finding required by BLM to eliminate the closures would have to be set aside. Opinion at 67
28 (“Because the “no jeopardy” finding is unsupported, any determination under 43 C.F.R. § 8341.2(a) that the

1 ‘adverse effects have been eliminated and measures implemented to prevent recurrence’ based upon the 2005
2 BO must be set aside.”).⁴

3 Existing law gives the Court broad authority to craft an injunction that provides protection to the
4 listed species and other resources of the Dunes. Given Plaintiffs only seek to maintain the status quo that
5 has existed for over six years, Plaintiffs do not believe either the BLM or Defendant-Intervenors can
6 rationally or reasonably object to the relief they seek. Plaintiffs therefore respectfully request that the Court
7 issue an Order continuing the interim closures until BLM and FWS have demonstrated compliance with the
8 ESA, NEPA and FLPMA on remand.⁵

9 **VI. Completion of a new ROD, RAMP and EIS on Remand**

10 Plaintiffs expect Defendant-Intervenors to argue that BLM and FWS must complete the various
11 actions on remand pursuant to a specific timeline. FWS and BLM are likely to argue for no timeline at all.
12 With the exception of the revised critical habitat rule for which Plaintiffs seek completion by a date certain
13 (see discussion supra), Plaintiffs do not seek a specific timeline on remand or even an order that the
14 remanded actions ever occur. So long as the Interim Vehicle Closures remain in effect, Plaintiffs care little
15 about when or if a new RAMP is completed. The 2005 ROD culminated a seven-year planning process
16 which in Plaintiffs’ opinion changed little at the Dunes other than seeking to eliminate the Interim Vehicle
17 Closures. The 1987 RAMP provides equal or better protection for most of the resources of the Dunes.
18 Moreover, any deadline the Court sets for a new ROD and RAMP would likely be met with a motion to
19 extend it by BLM as the deadline approached.

20 However, assuming BLM and FWS ultimately do complete a new ROD, EIS, RAMP and BiOp on
21 remand, Plaintiffs request that the Court retain jurisdiction to hear any challenge on remand. See Proposed
22 Order at Paragraphs 7 and 8. Nevertheless, Plaintiffs are hopeful that BLM and FWS will comply with the
23

24 ⁴ Given the Court has found the decision documents which would eliminate the Interim Vehicle
25 Closures to be unlawful, Plaintiffs believe the closures would necessarily be maintained regardless of
26 whether the Court explicitly required the continuation of the closures in its Order on remedy.
27 Nevertheless, in the interests of caution and ensuring that BLM does in fact keep the closures in effect,
28 Plaintiffs request that the Court make the closures enforceable as an Order of this Court.

⁵ Plaintiffs also request that the Court impose monitoring and reporting requirements on BLM to ensure
compliance with the Interim Vehicle Closures pending remand. See Proposed Order at Paragraph 5.

1 Court's Opinion and Order, and the procedural and substantive mandates of the ESA, NEPA and FLPMA,
2 and develop and implement a management scheme for the Dunes that all parties to this litigation can accept.

3 **VII. Conclusion**

4 For all of the foregoing reasons, Plaintiffs respectfully request that the Court enter an Order consistent
5 with the Proposed Order submitted by Plaintiffs concurrently with this memorandum.

6
7 DATED: July 10, 2006

Respectfully submitted,

8 /s/Brendan Cummings
9 Deborah A. Sivas (CA Bar # 135446)
10 Holly D. Gordon (CA Bar # 226888)
11 Stanford Law School Environmental Law Clinic
12 559 Nathan Abbott Way
13 Stanford, CA 94305-8620
14 Telephone: (650) 723-0325
15 Facsimile: (650) 725-8509
16 Email: dsivas@stanford.edu

17
18 Lisa T. Belenky (CA Bar # 203225)
19 CENTER FOR BIOLOGICAL DIVERSITY
20 1095 Market St., Suite 511
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Attorneys for Plaintiffs