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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

OREGON NATURAL DESERT ASS’N,

Case No. 05-1587-ST

Plaintiff,

v.

**MOTION TO COMPEL
PREPARATION OF A VAUGHN INDEX**

U.S. DEPARTMENT OF THE INTERIOR,
GALE A. NORTON, Secretary, U.S. Department
of the Interior, **ELAINE M. BRONG**, State
Director, Oregon State Office, U.S. Bureau of
Land Management, and **DANA SHUFORD**,
District Manager, Burns District BLM,

Defendants.

Plaintiff Oregon Natural Desert Association (“ONDA”) moves this court for an order requiring Defendant U.S. Department of the Interior *et al.* to provide within 20 days of the date of the court’s Order, an itemized, indexed inventory of every agency record or portion thereof responsive to ONDA’s request which Defendants assert to be exempt from disclosure, accompanied by a detailed justification statement covering each refusal to release records or portions thereof in accordance with the indexing requirements of Vaughn v. Rosen, 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974). Pursuant to Local Rule 7.1(a)(1), counsel for

Plaintiff attempted to confer with counsel for Defendants, but was unable to ascertain Defendants' position on this motion.

DATED this 19th day of October, 2005.

Respectfully Submitted,

s/ Peter M. Lacy

Peter M. Lacy (OSB # 01322)
Oregon Natural Desert Association

Of Attorneys for Plaintiff