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COUNSEL IDENTIFICATION ON FINAL PAGE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NATURAL RESOURCES DEFENSE
COUNCIL, *et al.*,

 Plaintiffs,

 v.

RYAN K. ZINKE, in his official capacity
as Secretary of the Interior, *et al.*,

 Defendants.

Case No. 1:05-cv-01207 LJO-EPG

**STIPULATION AND ORDER TO EXTEND
DEADLINES**

SAN LUIS & DELTA MENDOTA
WATER AUTHORITY, *et al.*,

 Defendants-Intervenors.

ANDERSON-COTTONWOOD
IRRIGATION DISTRICT, *et al.*,

 Joined Parties.

1 WHEREAS, on May 18, 2017, the parties filed the first joint stipulated request to extend
2 the deadlines to file all motions regarding completeness of the administrative record, any motions
3 or stipulations to limit review of the Sixth Claim as against Federal Defendants to the
4 administrative record, and any notice to the Court and parties of intent to seek discovery on the
5 Sixth Claim as against Federal Defendants from May 24 to June 7, 2017 (ECF No. 1088), which
6 was granted by this Court on the same day (ECF No. 1089);

7 WHEREAS, Plaintiffs and Federal Defendants have reached a tentative agreement that will
8 avoid motion practice concerning discovery against the Federal Defendants with respect to
9 Plaintiffs' Sixth Claim;

10 WHEREAS, in order to promote the efficient resolution of Plaintiffs' Sixth Claim and
11 obviate the need for any discovery as against the Federal Defendants, Federal Defendants are now
12 seeking to reach a similar agreement with the SRS Contractors;

13 WHEREAS, Plaintiffs and Federal Defendants are diligently working toward resolving
14 questions about the scope of the administrative record in an effort to obviate the need for motion
15 practice;

16 **STIPULATION**

17 NOW THEREFORE, counsel for Plaintiffs and Defendants hereby stipulate to and jointly
18 request an order extending the deadlines to file all motions regarding completeness of the
19 administrative record, any motions or stipulations to limit review of the Sixth Claim as against
20 Federal Defendants to the administrative record, and any notice to the Court and parties of intent to
21 seek discovery on the Sixth Claim as against Federal Defendants by fourteen days, to and including
22 June 21, 2017.

23
24
25 DATED: June 7, 2017

/s/ Nicole M. Smith
Nicole M. Smith

26 U.S. DEPARTMENT OF JUSTICE
27 ENVIRONMENT & NATURAL RESOURCES
DIVISION
28 601 D Street, NW Room 3712
Washington, D.C. 20044-7611

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*Attorneys for Respondents Ryan K. Zinke, in his
official capacity as Secretary of the Interior, et al.*

DATED: June 7, 2017

/s/ Katherine S. Poole (as authorized on June 7,
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*Attorneys for Intervenors and Joined Party
Defendants Reclamation District No. 108, Sutter
Mutual Water Company, Natomas Central Mutual
Water Company, River Garden Farms Company,
Pleasant Grove-Verona Mutual Water Company,*

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Pelger Mutual Water Company, Meridian Farms Water Company, Henry D. Richter, et al., Howald Farms, Inc., Oji Brothers Farm, Inc., Oji Family Partnership, Carter Mutual Water Company, Windswept Land And Livestock Company, Maxwell Irrigation District, and Tisdale Irrigation and Drainage Company

DATED: June 7, 2017

/s/ Andrew Hitchings (as authorized on June 7, 2017)
Andrew Hitchings

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DATED: June 7, 2017

/s/ Daniel J. O'Hanlon (as authorized on June 7 2017)
Daniel J. O'Hanlon

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ORDER

Pursuant to the Parties' Stipulation, the Court hereby ORDERS that the deadlines to file all motions regarding completeness of the administrative record, any motions or stipulations to limit review of the Sixth Claim as against Federal Defendants to the administrative record, and any notice to the Court and parties of intent to seek discovery on the Sixth Claim as against Federal Defendants shall be extended by fourteen days, to and including June 21, 2017.

IT IS SO ORDERED.

Dated: June 7, 2017

/s/ Lawrence J. O'Neill
UNITED STATES CHIEF DISTRICT JUDGE