1	COUNSEL IDENTIFICATION ON FINA	L PAGE
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4	UNITED STATES DISTRICT COURT	
5	EASTERN DISTRICT OF CALIFORNIA	
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7 8	NATURAL RESOURCES DEFENSE COUNCIL, <i>et al.</i> ,	Case No. 1:05-cv-01207 LJO-EPG
9	Plaintiffs,	STIPULATION AND ORDER TO EXTEND DEADLINES
10	V.	
11	RYAN K. ZINKE, in his official capacity as Secretary of the Interior, <i>et al.</i> ,	
12	Defendants.	
13	Defendunts.	
14		
15	SAN LUIS & DELTA MENDOTA WATER AUTHORITY, <i>et al.</i> ,	
16 17	Defendants-Intervenors.	
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10	ANDERSON-COTTONWOOD IRRIGATION DISTRICT, et al.,	
20	Joined Parties.	
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	STIPULATION AND ORDER TO EXTEND DEADLINES CASE NO. 1:05-CV-01207 LJO-EPG	

1	WHEREAS, on June 7, 2017, the parties filed the second 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 June 7 to June 21, 2017 (ECF No. 1090), which	
6	was granted by this Court on the same day (ECF No. 1092);	
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, Plaintiffs and Federal Defendants are diligently working toward resolving	
11	questions about the scope of the administrative record in an effort to obviate the need for motion	
12	practice;	
13	WHEREAS, the SRS Contractors are amenable to this stipulation provided that they are	
14	included in further meet and confer discussions between Federal Defendants and Plaintiffs	
15	regarding any agreement the Federal Defendants and Plaintiffs may reach to: (1) obviate the need	
16	for third-party discovery on Plaintiffs' Sixth Claim as against the SRS Contractors; or (2) limit	
17	review of Plaintiffs' Sixth Claim as against the Federal Defendants to an administrative record or	
18	any other limited scope of evidence.	
19	STIPULATION	
20	NOW THEREFORE, counsel for Plaintiffs and Defendants hereby stipulate to and jointly	
21	request an order extending the deadlines to file all motions regarding completeness of the	
22	administrative record, any motions or stipulations to limit review of the Sixth Claim as against	
23	Federal Defendants to the administrative record, and any notice to the Court and parties of intent to	
24	seek discovery on the Sixth Claim as against Federal Defendants by fourteen days, to and including	
25	July 5, 2017.	
26	DATED. June 21 2017 (a/ Nicela M. Smith	
27	DATED: June 21, 2017 <u>/s/Nicole M. Smith</u> Nicole M. Smith	
28	U.S. DEPARTMENT OF JUSTICE	
	STIPULATION AND ORDER TO EXTEND DEADLINES CASE NO. 1:05-CV-01207 LJO-EPG 1	

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9		Attorneys for Respondents Ryan K. Zinke, in his official capacity as Secretary of the Interior, et al.
10		
11	DATED: June 21, 2017	<u>/s/ Barbara J. Chisholm</u> (as authorized on June 21, 2017). Barbara J. Chisholm
12		BARBARA JANE CHISHOLM (SBN 224656)
13		HAMILTON CANDEE (SBN 111376) TONY LOPRESTI (SBN 289269)
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24 25	DATED: June 21, 2017	<u>/s/Meredith Nikkel</u> (as authorized on June 21, 2017) Meredith Nikkel
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	STIPULATION AND ORDER TO EXTEND DEADLINES CASE NO. 1:05-CV-01207 LJO-EPG	2

1		
1 2		Attorneys for Intervenors and Joined Party
2		Defendants Reclamation District No. 108, Sutter Mutual Water Company, Natomas Central Mutual
		Water Company, River Garden Farms Company, Pleasant Grove-Verona Mutual Water Company,
4 5		Pelger Mutual Water Company, Meridian Farms
5		Water Company, Henry D. Richter, et al., Howald Farms, Inc., Oji Brothers Farm, Inc., Oji Family
6		Partnership, Carter Mutual Water Company, Windswept Land And Livestock Company, Maxwell
7		Irrigation District, and Tisdale Irrigation and
8		Drainage Company
9	DATED: June 21, 2017	/s/ Andrew Hitchings (as authorized on June 21,
10		2017)
11		Andrew Hitchings
12		SOMACH SIMMONS & DUNN
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16		Attorneys for Intervenors and Joined Party Defendants Glenn-Colusa Irrigation District,
17		Princeton-Codora-Glenn Irrigation District,
18		Provident Irrigation District, Anderson-Cottonwood Irrigation District, City Of Redding, M & T Chico
19		Ranch (Pacific Realty Associates), Reclamation District No. 1004, Conaway Preservation Group,
20		LLC, and David and Alice te Velde Family Trust
21		
22	DATED: June 21, 2017	<u>/s/ Daniel J. O'Hanlon (</u> as authorized on June 21 2017)
23		Daniel J. O'Hanlon
24		KRONICK, MOSKOVITZ, TIEDEMANN &
		GIRARD
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	STIPULATION AND ORDER TO EXTEND DEADLINES	Attorneys for Defendant-Intervenors and Joined
	CASE NO. 1:05-CV-01207 LJO-EPG	3

1	Party Defendants, San Luis & Delta-Mendota Water Authority, Westlands Water District, Coelho Family
2	Trust, Eagle Field Water District, Fresno Slough
3	Water District, Mercy Springs Water District, Oro Loma Water District, and Tranquillity Irrigation
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	STIPULATION AND ORDER TO EXTEND DEADLINES CASE NO. 1:05-CV-01207 LJO-EPG 4
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1	ORDER	
2	Pursuant to the Parties' Stipulation, the Court hereby ORDERS that the deadlines to file all	
3	motions regarding completeness of the administrative record, any motions or stipulations to limit	
4	review of the Sixth Claim as against Federal Defendants to the administrative record, and any	
5	notice to the Court and parties of intent to seek discovery on the Sixth Claim as against Federal	
6	Defendants shall be extended by fourteen days, to and including July 5, 2017.	
7	IT IS SO ORDERED.	
8	Dated: June 21, 2017 /s/ Lawrence J. O'Neill	
9	UNITED STATES CHIEF DISTRICT JUDGE	
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	STIPULATION AND ORDER TO EXTEND DEADLINES CASE NO. 1:05-CV-01207 LJO-EPG 5	