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15 *Attorneys for Petitioners and Plaintiffs Local Agencies of the North Delta,*
16 *Central Delta Water Agency, South Delta Water Agency*

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19 AQUALLIANCE; CALIFORNIA
SPORTFISHING PROTECTION ALLIANCE;
20 CENTRAL DELTA WATER AGENCY;
SOUTH DELTA WATER AGENCY; LOCAL
21 AGENCIES OF THE NORTH DELTA,

22 Petitioners and Plaintiffs,

23 v.

24 THE UNITED STATES BUREAU OF
RECLAMATION; SAN LUIS & DELTA-
MENDOTA WATER AUTHORITY; U.S. FISH
25 AND WILDLIFE SERVICE; U.S.
DEPARTMENT OF THE INTERIOR; SALLY
26 JEWELL, in her official capacity; and DOES 1 –
100,

27 Respondents and Defendants.
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1:15-cv-00754-LJO-BAM

JOINT STIPULATION TO EXTEND TIME ON
SUPPLEMENTAL FILING FOR
MOTION/PETITION FOR ATTORNEYS FEES,
COSTS, AND EXPENSES; [PROPOSED]
ORDER

Hon. Lawrence O’Neill

1 **STIPULATION**

2 PLAINTIFFS, AquAlliance, California Sportfishing Protection Alliance, Central Delta Water
3 Agency, South Delta Water Agency and Local Agencies of the North Delta; and DEFENDANTS,
4 United States Bureau of Reclamation, United States Fish and Wildlife Service, and San Luis & Delta-
5 Mendota Water Authority file this Joint Stipulation and [Proposed] Order to extend time for
6 supplemental and response filings regarding Plaintiffs’ preliminary Motion/Petition for Attorneys’ Fees,
7 Costs, and Expenses, filed concurrently herewith.

8 WHEREAS, on June 29, 2018, the Parties lodged a Proposed Final Judgment with the intent that
9 all applicable timelines regarding Plaintiffs’ claims for recovery of fees and costs be extended at least
10 thirty (30) days to enable sufficient time for the parties to meet and confer and negotiate in good faith in
11 an attempt to resolve Plaintiffs’ claims without further litigation;

12 WHEREAS, on July 5, 2018, the Court entered Judgment in this matter;

13 WHEREAS, the parties have met and conferred and desire additional time to negotiate in good
14 faith to attempt to resolve Plaintiffs’ claims without further litigation;

15 WHEREAS, Plaintiffs are filing, concurrently with this Stipulation and Proposed Order, a
16 preliminary Motion/Petition for Attorneys’ Fees, Costs, and Expenses; and,

17 WHEREAS, in furtherance of the intent of the Parties to negotiate in good faith to resolve
18 Plaintiffs’ claims for fees and costs without further litigation, no party will contest the timeliness of
19 Plaintiffs’ Motion/Petition for Attorneys’ Fees, Costs, and Expenses, subject to the deadlines agreed to,
20 below:

21 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE:

22 Plaintiffs shall have until September 5, 2018 to file a Supplemental Motion/Petition for
23 Attorneys’ Fees, Costs, and Expenses, and Supplemental Memorandum in Support thereof not to exceed
24 twenty (20) pages in length;

25 Defendants’ opposition brief(s) shall be filed no later than October 5, 2018, and shall not exceed
26 forty (40) pages combined;

27 Plaintiffs’ may file a single combined reply brief no later than October 25, which shall not
28 exceed twenty-five (25) pages.

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Dated: July 20, 2018

AQUA TERRA AERIS LAW GROUP

By: /s/ Jason R. Flanders
Jason R. Flanders
Attorneys for Petitioners
AquAlliance, California Sportfishing
Protection Alliance

Dated: July 20, 2018

SOLURI MESERVE, A LAW CORPORATION

By: /s/ Patrick M. Soluri
Patrick M. Soluri
Attorney for Plaintiffs
Local Agencies of the North Delta, Central
Delta Water Agency, South Delta Water Agency

Dated: July 20, 2018

KRONICK, MOSKOVITZ, TIEDEMANN &
GIRARD
A Professional Corporation

By: /s/ Daniel J. O'Hanlon
Daniel J. O'Hanlon
Attorneys for Defendant/Respondent,
San Luis & Delta-Mendota Water Authority

Dated: July 20, 2018

JEFFREY H. WOOD
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Attorneys for Federal Defendants

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ORDER

Pursuant to Stipulation of the Parties, it is so ORDERED:

Plaintiffs shall have until September 5, 2018 to file a Supplemental Motion/Petition for Attorneys' Fees, Costs, and Expenses, and a Supplemental Memorandum in Support thereof not to exceed twenty (20) pages in length;

Defendants' opposition brief(s) shall be filed no later than October 5, 2018, and shall not exceed forty (40) pages combined¹; and

Plaintiffs' may file a single combined reply brief no later than October 25, which shall not exceed twenty-five (25) pages.

Given this Court's present and anticipated workload, the parties are reminded to make every effort to present to the Court only issues that are truly in dispute and to do so in the most efficient manner possible.

IT IS SO ORDERED.

Dated: July 26, 2018

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

¹ No individual Defendant's brief may exceed the normal page limit (25 pages).