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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.  
28

1:15-cv-00754-LJO-BAM

JOINT STIPULATION TO EXTEND TIME ON  
SUPPLEMENTAL FILING FOR  
MOTION/PETITION FOR ATTORNEY'S  
FEES, COSTS, AND EXPENSES; ORDER

Honorable 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 United  
4 States Bureau of Reclamation, United States Fish and Wildlife Service, and San Luis and Delta-Mendota  
5 Water Authority file this Joint Stipulation and Proposed Order to extend time for supplemental and  
6 response filings regarding Plaintiffs’ Preliminary Motion/Petition for Attorneys’ Fees, Costs, and  
7 Expenses, previously filed on July 23, 2018 (ECF No. 87).

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 met and conferred and desire additional time to negotiate in good faith to  
14 attempt to resolve Plaintiffs’ claims without further litigation;

15 WHEREAS, Plaintiffs filed a Stipulation and Proposed Order along with a Preliminary  
16 Motion/Petition for Attorneys’ Fees, Costs, and Expenses, providing that Plaintiffs would have until  
17 September 5th, to file a Supplemental Motion/Petition for Attorneys’ Fees, Costs, and Expenses, and  
18 Supplemental Memorandum in Support thereof, which was approved by the Court on July 26, 2018  
19 (ECF No. 88); and,

20 WHEREAS, the parties are continuing to negotiate in good faith and desire additional time to  
21 resolve Plaintiffs’ claims without further litigation;

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

26 **NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE:**

27 Plaintiffs’ deadline to file its supplemental motion papers is extended by forty-four (44) days  
28 until no later than October 19, 2018, and shall not exceed twenty (20) pages in length;

1 Defendants' opposition brief shall be filed no later than November 19, 2018, and shall not  
2 exceed forty (40) pages combined;

3 Plaintiffs' may file a single combined reply brief no later than December 13, 2018, which shall  
4 not exceed twenty-five (25) pages.

5 Dated: August 20, 2018

AQUA TERRA AERIS LAW GROUP

6 By: /s/ Jason R. Flanders  
7 Jason R. Flanders  
8 Attorneys for Plaintiffs  
9 AquAlliance, California Sportfishing  
10 Protection Alliance

11 Dated: August 20, 2018

SOLURI MESERVE, A LAW CORPORATION

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

17 Dated: August 20, 2018

KRONICK, MOSKOVITZ, TIEDEMANN &  
GIRARD  
A Professional Corporation

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

22 Dated: August 20, 2018

PIONEER LAW GROUP

23 By: /s/ Andrea A. Matarazzo  
24 Andrea A. Matarazzo  
25 Attorneys for Defendant/Respondent  
26 San Luis & Delta-Mendota Water Authority

27 Dated: August 20, 2018

JEFFREY H. WOOD  
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Attorneys for Federal Defendants

**ORDER**

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

Plaintiffs shall have until October 19, 2018 to file a Supplemental Motion/Petition for Attorneys' Fees, Costs, and Expenses, and Supplemental Memorandum in Support thereof not to exceed twenty (20) pages in length;

Defendants' opposition brief shall be filed no later than November 19, 2018, and shall not exceed forty (40) pages combined;

Plaintiffs' may file a single combined reply brief no later than December 13, 2018, which shall not exceed twenty-five (25) pages.

IT IS SO ORDERED.

Dated: August 21, 2018

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