

1 JOSEPH M. MARCHINI #082427
LAUREN D. LAYNE #273627
2 GABRIEL A. DELGADO #294233
JESSICA S. JOHNSON #328222
3 Baker Manock & Jensen, PC
5260 North Palm Avenue, Suite 201
4 Fresno, California 93704
Telephone: 559.432.5400
5 Facsimile: 559.432.5620

6 Attorneys for Defendants TRANQUILLITY IRRIGATION DISTRICT;
PACHECO WATER DISTRICT; MERCY SPRINGS WATER
7 DISTRICT; EAGLE FIELD WATER DISTRICT; LAGUNA
WATER DISTRICT; FRESNO SLOUGH WATER DISTRICT
8

9
10
11
12
13
14
15
16
17
18
19
20
21

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

NORTH COAST RIVERS ALLIANCE,
CALIFORNIA SPORTSFISHING
PROTECTION ALLIANCE, PACIFIC
COAST FEDERATION OF FISHERMEN'S
ASSOCIATIONS, SAN FRANCISCO CRAB
BOAT OWNERS ASSOCIATION, INC., and
INSTITUTE FOR FISHERIES RESOURCES,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE
INTERIOR, et al.,

Defendants,

Case No. 1:16-CV-307 DAD-SKO

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO THE THIRD AMENDED
AND SUPPLEMENTAL COMPLAINT**

(Fed. R. Civ. P. 6 & Local Rule 144)

(Doc. 180)

Judge: Hon. Dale A. Drozd

**STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO THIRD
AMENDED AND SUPPLEMENTAL COMPLAINT**

Pursuant to Local Rule 144, Defendants TRANQUILLITY IRRIGATION
DISTRICT; PACHECO WATER DISTRICT; MERCY SPRINGS WATER DISTRICT; EAGLE
FIELD WATER DISTRICT; LAGUNA WATER DISTRICT; and FRESNO SLOUGH WATER

1 DISTRICT (collectively, “Defendants”) and Plaintiffs NORTH COAST RIVERS ALLIANCE,
2 CALIFORNIA SPORTSFISHING PROTECTION ALLIANCE, PACIFIC COAST
3 FEDERATION OF FISHERMEN’S ASSOCIATIONS, SAN FRANCISCO CRAB BOAT
4 OWNERS ASSOCIATION, INC., and INSTITUTE FOR FISHERIES RESOURCES
5 (collectively, “Plaintiffs”), by and through their respective counsel of record, hereby stipulate as
6 follows:

7 WHEREAS, Plaintiffs electronically served their Summons (Docs. 162, 163, and
8 165) and Third Amended and Supplemental Complaint for Declarative and Injunctive Relief
9 (“TASC”) (Doc. 156) on the Defendants, and Defendants accepted such electronic service on
10 February 10, 2022;

11 WHEREAS, counsel for Defendants anticipate the need for an additional amount of
12 time to respond to the TASC due to the complexity of the issues presented and the number of
13 Defendants needing to respond;

14 WHEREAS, Defendants have requested, and Plaintiffs have consented to, an
15 additional forty (40) days for Defendants to respond to the TASC in addition to the time allowed
16 by pursuant to Federal Rule of Civil Procedure Rule 12(a), which new due date is intended to and
17 shall be **April 12, 2022**;

18 WHEREAS, as this is the first extension request by Defendants in this action and
19 relating to responding to the TASC, and the Defendants and Plaintiffs have entered into this
20 Stipulation to be filed with the Court, the first twenty-eight (28) days of the extension are
21 authorized under Local Rule 144(a);

22 WHEREAS, should the Court sign the [Proposed] Order included hereto,
23 Defendants and Plaintiffs agree and hereby request that the Court extend the time to respond to the
24 TASC for the remaining amount of the request for extension.

25 ///
26 ///
27 ///
28 ///

1 NOW THEREFORE, IT IS HEREBY STIPULATED by and among the parties,
2 through their respective counsel, that Defendants shall answer or otherwise respond to the Third
3 Amended and Supplemental Complaint by April 12, 2022.

4
5 DATED: February 28, 2022

BAKER MANOCK & JENSEN, PC

6 By: _____ /s/ Jessica S. Johnson

7 Joseph M. Marchini

8 Lauren D. Layne

9 Gabriel A. Delgado

Jessica S. Johnson

10 Attorneys for Defendants TRANQUILLITY
11 IRRIGATION DISTRICT; PACHECO WATER
12 DISTRICT; MERCY SPRINGS WATER
13 DISTRICT; EAGLE FIELD WATER DISTRICT;
14 LAGUNA WATER DISTRICT; FRESNO
15 SLOUGH WATER DISTRICT

16 DATED: February 25, 2022

LAW OFFICES OF STEPHAN C. VOLKER

17 _____ /s/ Stephan C. Volker as authorized on
18 By: _____ 2/25/2022

19 Stephan C. Volker

20 Alexis E. Krieg

21 Stephanie L. Clarke

22 Jamey M.B. Volker

23 Attorneys for Plaintiffs NORTH COAST RIVERS
24 ALLIANCE, CALIFORNIA SPORTSFISHING
25 PROTECTION ALLIANCE, PACIFIC COAST
26 FEDERATION OF FISHERMEN'S
27 ASSOCIATIONS, SAN FRANCISCO CRAB
28 BOAT OWNERS ASSOCIATION, INC., and
INSTITUTE FOR FISHERIES RESOURCES

ORDER

24 Pursuant to the foregoing stipulation of the parties (Doc. 180), and for good cause shown, it
25 is hereby ORDERED that the deadline for Defendants TRANQUILLITY IRRIGATION
26 DISTRICT; PACHECO WATER DISTRICT; MERCY SPRINGS WATER DISTRICT; EAGLE
27 FIELD WATER DISTRICT; LAGUNA WATER DISTRICT; and FRESNO SLOUGH WATER
28 DISTRICT to respond to Plaintiffs' Third Amended and Supplemental Complaint is extended to

1 and including April 12, 2022.

2

3 IT IS SO ORDERED.

4 Dated: March 1, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28