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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 PACIFIC COAST FEDERATION OF
13 FISHERMEN’S ASSOCIATIONS, et al.,
14 Plaintiffs,

15 v.

16 GINA RAIMONDO, in her official
17 capacity as Secretary of Commerce, et
18 al.,
19 Defendants.

19 THE CALIFORNIA NATURAL
20 RESOURCES AGENCY, et al.,
21 Plaintiffs,

22 v.

22 GINA RAIMONDO, et al.,
23 Defendants.

Case No. 1:20-cv-00426-DAD-EPG
Case No. 1:20-cv-00431-DAD-EPG

**STIPULATION TO EXTEND BY TWO DAYS
FEDERAL DEFENDANTS’ DEADLINE TO
RESPOND TO PLAINTIFFS’ MOTIONS TO
COMPLETE AND/OR SUPPLEMENT THE
ADMINISTRATIVE RECORDS**

1 This stipulation is entered between the parties for an extension of two days for Federal
2 Defendants to respond to Plaintiffs' motions in *Pacific Coast Federation of Fishermen's*
3 *Associations v. Raimondo* ("PCFFA"), Case No. 1:20-cv-00431-DAD-EPG, to complete the
4 administrative records or, in the alternative, supplement the administrative records (ECF 224),
5 and in *California Natural Resources Agency v. Raimondo* ("CNRA"), Case No. 1:20-cv-00426-
6 DAD-EPG (ECF 149, ECF 158), to complete and supplement the records (collectively,
7 "Plaintiffs' Motions"), and corresponding extensions for the deadlines for Intervenor-
8 Defendants' responses as well as any replies by Plaintiffs.

9 RECITALS

10 WHEREAS, on September 23, 2020, the parties stipulated to a schedule for Federal
11 Defendants to produce the administrative records of the United States Fish and Wildlife Service
12 ("FWS"), the National Marine Fisheries Service ("NMFS"), and Bureau of Reclamation
13 ("BOR") for these cases, *CNRA*, ECF 142; *PCFFA*, ECF 217, and the stipulation established a
14 meet and confer process regarding the submitted administrative records and a briefing schedule
15 for any motions to supplement and/or complete the records;

16 WHEREAS, in accordance with the parties' stipulation, Federal Defendants submitted
17 the three agencies' respective administrative records in these cases on September 23, 2020,
18 *CNRA*, ECF 143; *PCFFA*, ECF 218, and after receiving the records, Plaintiffs in both cases and
19 Intervenor-Defendants identified documents and categories of documents that they wished the
20 agencies would include in the records, the parties met and conferred, and in an effort to narrow
21 the scope of the dispute, Federal Defendants agreed to add certain, but not all, of these
22 documents to the records;

23 WHEREAS, on December 18, 2020, Plaintiffs in *CNRA* and *PCFFA* filed separate
24 motions to complete and/or supplement the administrative records along with memorandums of
25 law and exhibits, *CNRA*, ECF 149-155; *PCFFA*, ECF 224-239;

1 Plaintiffs' Motions is extended to July 19, 2021; and (3) the due date for Plaintiffs' replies is
2 extended to August 9, 2021.

3 Respectfully submitted,

4 Dated: July 12, 2021

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Acting Assistant Attorney General
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U.S. Department of Justice
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11
12 /s/ Clifford E. Stevens, Jr.
CLIFFORD E. STEVENS, JR.
13 Sr. Trial Attorney
Attorneys for Federal Defendants

14 Dated: July 12, 2021

15 /s/ Barbara Jane Chisholm
HAMILTON CANDEE
16 BARBARA JANE CHISHOLM
ELIZABETH VISSERS
17 ALTSHULER BERZON LLP
Attorneys for Plaintiffs Golden State Salmon Association,
18 Natural Resources Defense Council Inc., Defenders of
Wildlife, and Bay.Org d/b/a The Bay Institute

19
20 Dated: July 12, 2021

21 /s/ Glen H. Spain
GLEN H. SPAIN
22 Attorney for Plaintiffs Pacific Coast Federation of
Fishermen's Associations and Institute for Fisheries
Resources

23 Dated: July 12, 2021

24 ROB BONTA
Attorney General of California
25 TRACY L. WINSOR
Supervising Deputy Attorney General

26 /s/ Daniel M. Fuchs
27 DANIEL M. FUCHS
Deputy Attorney General

28 Stipulation to Extend Briefing Deadlines for Plaintiffs' Record Motions
Case Nos. 1:20-cv-00426-DAD-EPG; 1:20-cv-00431-DAD-EPG

1 *Attorneys for Plaintiffs California Natural Resources*
2 *Agency, California Environmental Protection Agency, and*
3 *People of the State of California by and through Attorney*
4 *General Rob Bonta*

4 Dated: July 12, 2021

5 /s/ Daniel J. O'Hanlon
6 Daniel J. O'Hanlon
7 DANIEL J. O'HANLON (SBN 122380)
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11 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
12 *Attorneys for San Luis & Delta-Mendota Water Authority*
13 *and Westlands Water District*

10 Dated: July 12, 2021

11 /s/ Andrew Hitchings
12 ANDREW HITCHINGS
13 SOMACH SIMMONS & DUNN
14 *Attorneys for Intervenor-Defendants Glenn-Colusa*
15 *Irrigation District; Reclamation District No. 1004;*
16 *Conaway Preservation Group, LLC; David and Alice te*
17 *Velde Family Trust; Pelger Road 1700, LLC; Anderson-*
18 *Cottonwood Irrigation District; City of Redding; and*
19 *Knights Landing Investors, LLC*

16 Dated: July 12, 2021

17 /s/ Meredith E. Nikkel
18 MEREDITH E. NIKKEL
19 DOWNEY BRAND LLP
20 *Attorneys for Reclamation District No. 108, Sutter Mutual*
21 *Water Company; Natomas Central Mutual Water*
22 *Company; River Garden Farms Water Company; Pleasant*
23 *Grove-Verona Mutual Water Company; Pelger Mutual*
24 *Water Company; Meridian Farms Water Company; Henry*
25 *D. Richter, Et Al.; Howald Farms, Inc.; Oji Brothers Farm,*
26 *Inc.; Oji Family Partnership; Carter Mutual Water*
27 *Company; Windswept Land And Livestock Company;*
28 *Maxwell Irrigation District; Beverly F. Andreotti, Et Al.;*
Tisdale Irrigation And Drainage Company; Provident
Irrigation District; Princeton-Codora-Glenn Irrigation
District; And Tehama-Colusa Canal Authority

25 Dated: July 12, 2021

26 /s/ Mathew G. Adams
27 MATTHEW G. ADAMS
28 KAPLAN KIRSCH & ROCKWELL, LLP
Attorneys for Friant Water Authority and Arvin-Edison
Water Storage District

Stipulation to Extend Briefing Deadlines for Plaintiffs' Record Motions
Case Nos. 1:20-cv-00426-DAD-EPG; 1:20-cv-00431-DAD-EPG

1 Dated: July 12, 2021

/s/ Jenna R. Mandell-Rice
JENNA R. MANDELL-RICE
VAN NESS FELDMAN, LLP
*Attorneys for Intervenor-Defendants The State Water
Contractors*

5 Dated: July 12, 2021

/s/ Marc R. Bruner
MARC R. BRUNER
PERKINS COIE LLP
*Attorneys for Intervenor-Defendant Contra Costa Water
District*

9 Dated: July 12, 2021

/s/ Timothy O'Laughlin
TIMOTHY O'LAUGHLIN
O'LAUGHLIN & PARIS, PLC
*Attorneys for Intervenor-Defendant
Oakdale Irrigation District*

12 Dated: July 12, 2021

/s/ Kenneth Robbins
KENNETH ROBBINS
ROBBINS, BROWNING, GODWIN & MARCHINI
*Attorneys for Intervenor-Defendant South San Joaquin
Irrigation District*

16 Dated: July 12, 2021

/s/ Jennifer T. Buckman
JENNIFER T. BUCKMAN
BARTKIEWICZ, KRONICK & SHANAHAN, PC
*Attorneys for Intervenor-Defendant City of Folsom, City of
Roseville, and San Juan Water District*

20 **ORDER**

21 Pursuant to the Parties' Stipulation, the Court hereby orders as follows:

22 (1) the due date for Federal Defendants' responses to Plaintiffs' motions in *PCFFA v.*
23 *Raimondo*, Case No. 1: 20-cv-00431-DAD-EPG, to complete the administrative records or, in
24 the alternative, supplement the administrative records (ECF 224), and in *CNRA v. Raimondo*,
25 Case No. 1:20-cv-00426-DAD-EPG (ECF 149; ECF 158), to complete and supplement the
26 records, is July 14, 2021;

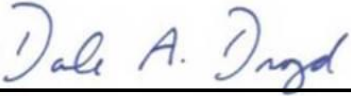
28 Stipulation to Extend Briefing Deadlines for Plaintiffs' Record Motions
Case Nos. 1:20-cv-00426-DAD-EPG; 1:20-cv-00431-DAD-EPG

1 (2) the due date for Intervenor-Defendants' responses to Plaintiffs' Motions is July 19,
2 2021; and

3 (3) the due date for Plaintiffs' replies is August 9, 2021.

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5 IT IS SO ORDERED.

6 Dated: July 14, 2021


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UNITED STATES DISTRICT JUDGE