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8 *Attorneys for Defendants*

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

11
 12 FRIENDS OF THE RIVER, DEFENDERS OF
 13 WILDLIFE, and CENTER FOR BIOLOGICAL
 DIVERSITY,

14 Plaintiffs,
 15 v.

16 UNITED STATES ARMY CORPS OF
 17 ENGINEERS, *et al.*,

18 Defendants.

Case No. 2:11-cv-01650-JAM-AC

**STIPULATION AND PROPOSED
 ORDER FOR CONTINUANCE OF
 MOTION HEARING**

1 Pursuant to stipulation, L.R. 143 and 251, and the Court's August 5, 2013 Order (Doc.
2 No. 75), the parties, by and through their undersigned counsel, hereby request a fourteen day
3 continuance, from August 21, 2013, to September 4, 2013, of the hearing before Magistrate
4 Judge Allison Claire on Plaintiffs' motion to compel production of the administrative record as
5 presented in the Fourth Joint Status Report. In support of their request, the parties hereby state
6 as follows:

7 1. In the time since the Court's August 5, 2013, order (Doc. No. 75) setting the motion to
8 compel for hearing on August 21, 2013, counsel for the parties have had several productive
9 discussions regarding Plaintiffs' issues with the Administrative Record, Defendants' responses,
10 and options to resolve those differences.

11 2. The parties seek this continuance to allow them additional time to confer and attempt
12 to resolve their differences. As the parties' discussions have proceeded, they have been able to
13 more specifically identify their concerns with the Administrative Record and additional options
14 for proceeding. This requested extension will permit the parties to confer further about resolving
15 their differences and also enable the parties to submit, if finally necessary, a Joint Statement re
16 Discovery Disagreement that explains the basis for the parties' remaining differences with
17 greater precision.

18 Accordingly, in order to allow counsel additional time to confer about their differences
19 regarding the Administrative Record, the parties request a two week continuance until
20 September 4, 2013, of the hearing before Magistrate Judge Allison Claire on Plaintiffs' motion
21 to compel production of the administrative record as presented in the Fourth Joint Status Report.

22 Respectfully submitted this 14th day of August, 2013,

23
24 /s/ John H. Martin
25 Devon Lehman McCune, Trial Attorney
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14 /s/ Jason Rylander (by permission Aug. 14, 2013)

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Attorneys for Plaintiffs

1 IT IS SO ORDERED.

2 August 15, 2013

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4 ALLISON CLAIRE
5 UNITED STATES MAGISTRATE JUDGE

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