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7 Attorneys for Defendants  
 JOHN D. SWEENEY and POINT BUCKLER CLUB, LLC (also sued as Point Buckler, LLC)

8  
 9 UNITED STATES DISTRICT COURT  
 10 EASTERN DISTRICT OF CALIFORNIA

11 CALIFORNIA RIVER WATCH,  
 12 Plaintiff,  
 13 v.  
 14 JOHN DONNELLY SWEENEY; POINT  
 BUCKLER, LLC; POINT BUCKLER CLUB,  
 15 LLC; DOES 1 through 10, inclusive;  
 16 Defendants.

No. 2:16-CV-02972-KJM-KJN  
 STIPULATION EXTENDING TIME TO  
 RESPOND TO DISCOVERY  
 Courtroom: 3  
 Hon. Kimberly J. Mueller

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1 **STIPULATION**

2 Plaintiff California River Watch (“Plaintiff”) and Defendants John D. Sweeney and Point  
3 Buckler Club, LLC (also sued as Point Buckler, LLC) (collectively “Defendants”) hereby stipulate  
4 as follows:

5 1. On March 29, 2017, Plaintiff served Defendants with (1) Plaintiff’s First Requests  
6 For Admission to Defendant John Donnelly Sweeney, (2) Plaintiff’s First Request For Production of  
7 Documents and ESI to Defendant John Donnelly Sweeney, and (3) Plaintiff’s First Set of  
8 Interrogatories to Defendant John Donnelly Sweeney.

9 2. Federal Rule of Civil Procedure 29 provides, in pertinent part, that “Unless the court  
10 orders otherwise, the parties may stipulate that: . . . (b) other procedures governing or limiting  
11 discovery be modified—but a stipulation extending the time for any form of discovery must have  
12 court approval if it would interfere with the time set for completing discovery, for hearing a motion,  
13 or for trial.”

14 3. On February 24, 2017, the Court took under submission Defendants’ motion to  
15 dismiss, and set a case management conference for June 8, 2017.

16 4. On June 1, 2017, the Court vacated the June 8, 2017 case management conference  
17 and reset it to July 6, 2017.

18 5. On June 27, 2017, the Court vacated the July 6, 2017 case management conference  
19 and reset it to August 17, 2017.

20 6. Due to unavailability of counsel on August 17, parties are seeking to reschedule the  
21 case management conference.

22 7. In light of Defendants’ pending motion to dismiss, which if granted would moot  
23 Plaintiff’s discovery requests, and the rescheduled case management conference, the parties hereby  
24 stipulate to extend Defendants’ time to respond to the discovery requests listed in paragraph 1 above.  
25 Defendants’ time to respond is extended until eight (8) days after the case management conference.

26 8. This stipulation will not interfere with the time set for completing discovery, for  
27 hearing a motion, or for trial, because there are no such dates currently set.

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1           9.       In addition, Plaintiff agrees to re-notice the deposition of Defendant John Donnelly  
2 Sweeney to a date after Defendants respond to the discovery requests.

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6 DATED: July 11, 2017.

BRISCOE IVESTER & BAZEL LLP



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9 By: \_\_\_\_\_  
10 Lawrence S. Bazel  
11 Attorneys for Defendants JOHN D. SWEENEY  
and POINT BUCKLER CLUB, LLC (also sued as  
Point Buckler, LLC)

12 DATED: July 11, 2017.

LAW OFFICE OF JACK SILVER

13  
14 By: /s/ Jack Silver as authorized on July 13, 2017  
15 Jack Silver  
16 Attorney for Plaintiff  
CALIFORNIA RIVER WATCH

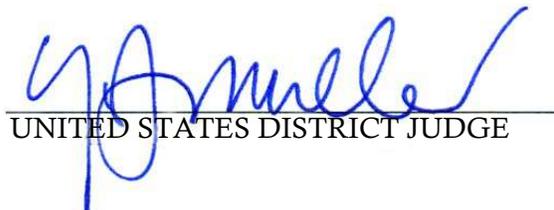
17 DATED: July 11, 2017.

LAW OFFICE OF EDWARD E. YATES

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19 By: /s/ Edward E. Yates as authorized on July 13, 2017  
20 Edward E. Yates  
21 Attorney for Plaintiff  
22 CALIFORNIA RIVER WATCH

23 IT IS SO ORDERED.

24 DATED: August 3, 2017



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26 UNITED STATES DISTRICT JUDGE  
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