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 15 UNITED STATES DISTRICT COURT  
 16 EASTERN DISTRICT OF CALIFORNIA  
 17

18	UNITED STATES OF AMERICA,	)	No. 2:18-cv-721-WBS-DB
19	Plaintiff,	)	
20	v.	)	<b>STIPULATION AND ORDER MODIFYING</b>
21	STATE OF CALIFORNIA; and	)	<b>BRIEFING SCHEDULE AND HEARING</b>
22	CALIFORNIA STATE LANDS	)	<b>DATE FOR CROSS-MOTIONS FOR</b>
23	COMMISSION, an agency of	)	<b>SUMMARY JUDGMENT</b>
24	the State of California,	)	
25	Defendants.	)	
26		)	
27		)	
28		)	

1 Plaintiff United States of America and Defendants State of California and California  
2 State Lands Commission (“the parties”) hereby respectfully submit the following stipulation and  
3 proposed order pursuant to Local Rule 143. If entered by the Court, this stipulation would  
4 modify the briefing schedule and hearing date for cross-motions for summary judgment  
5 established by the Court’s order of July 14, 2018 (Doc. 14). Under the revised schedule,  
6 summary judgment briefing would commence on August 16, rather than August 13, and the  
7 hearing date would be moved from October 15 to October 29.

8 The Court’s order of July 14, 2018, established the following briefing schedule and  
9 hearing date in accordance with the parties’ stipulation (Doc. 13) and Joint Status Report and  
10 Discovery Plan (Doc. 12):

- 11 - United States’ Motion for Summary Judgment: August 13, 2018
- 12 - Defendants’ Memorandum in Opposition/Cross-Motion: September 4, 2018
- 13 - United States’ Memorandum in Opposition/Reply Memorandum: September 24, 2018
- 14 - Defendants’ Reply Memorandum: October 1, 2018
- 15 - Hearing Date: October 15, 2018

16 In the Joint Status Report and Discovery Plan, the parties agreed to a discovery cut-off date of  
17 August 1, 2018, except that depositions of fact or expert witnesses submitting declarations could  
18 be conducted during briefing of the parties’ cross-motions for summary judgment. Doc. 12 at 4-  
19 5.

20 In light of the parties’ review of discovery responses to date (including document  
21 production more extensive than expected) and the potential need to review documents to be  
22 provided under a protective order (pursuant to the stipulation submitted for Court approval on  
23 July 27 (Doc. 15)), the parties request an extension of the briefing schedule to provide additional  
24 time for review of discovery materials and for depositions during briefing. The Parties therefore  
25 stipulate to, and respectfully ask that the Court approve, the following revised briefing schedule  
26 and hearing date:

- 27 - United States’ Motion for Summary Judgment: August 16, 2018
- 28 - Defendants’ Memorandum in Opposition/Cross-Motion: September 13, 2018

- 1 - United States' Memorandum in Opposition/Reply Memorandum: October 9, 2018  
2 - Defendants' Reply Memorandum: October 16, 2018  
3 - Hearing Date: October 29, 2018

4 Dated: August 1, 2018.

5 Respectfully submitted,

6 /s/ Peter J. McVeigh  
7 JEFFREY H. WOOD  
8 Acting Assistant Attorney General  
9 ERIC GRANT  
10 Deputy Assistant Attorney General  
11 JUSTIN HEMINGER  
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17 MCGREGOR W. SCOTT  
18 United States Attorney  
19 DAVID T. SHELEDY  
20 Civil Chief, Assistant United States Attorney

21 Counsel for Plaintiff United States of America

22 Dated: August 1, 2018

23 /s/ John Killeen (as authorized on Aug.1, 2018)  
24 XAVIER BECERRA  
25 Attorney General of California  
26 JAMEE JORDAN PATTERSON  
27 Supervising Deputy Attorney General  
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Supervising Deputy Attorney General  
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JOHN W. KILLEEN  
Deputy Attorney General  
Attorneys for the State Defendants

29 IT IS SO ORDERED.

30 Dated: August 2, 2018

31   
32 WILLIAM B. SHUBB  
33 UNITED STATES DISTRICT JUDGE