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 CALIFORNIA RIVER WATCH
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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 CALIFORNIA RIVER WATCH, an IRC
 Section 501(c)(3) WATCH, non-profit,
 11 public benefit corporation,
 12 Plaintiff,
 13 v.
 14 SONOMA VALLEY COUNTY
 SANITATION DISTRICT and SONOMA
 COUNTY WATER AGENCY,
 15

CASE NO.: 3:15-cv-01283 WHO

**EXPEDITED MOTION FOR
 RELIEF FROM CASE MANAGEMENT
 SCHEDULE; DECLARATION OF
 JERRY BERNHAUT; ~~PROPOSED~~
 ORDER
 [Civil L. R. 16-2(d)]**

16 Defendants.

Case Mgmt Conf.: July 21, 2015

17 Plaintiff CALIFORNIA RIVER WATCH hereby moves for relief from the Court's Order
 18 of May 12, 2015 re-setting the Initial Case Management Conference and ADR Deadlines (Dkt
 19 #9) in that Plaintiff moves to further extend all deadlines for a period of thirty (30) days.
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21 Dated: June 25, 2015

/s/ Jerry Bernhaut
 JERRY BERNHAUT
 Attorney for Plaintiff
 CALIFORNIA RIVER WATCH

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DECLARATION OF JERRY BERNHAUT

1. I am co-counsel for Plaintiff California River Watch herein, have personal knowledge of all matters stated herein, and, if called as a witness, could and would testify competently thereto.

2. A previous Expedited Motion for Relief was filed on behalf of Plaintiff on May 8, 2015 (Dkt # 8). At that time, the parties and their respective counsel were participating in active settlement discussions and anticipated resolution of the lawsuit by the end of June, 2015. The Court issued its Order (Dkt # 9) extending the deadlines set forth in the Order Setting Initial Case Management Conference and ADR Deadlines as follows:

Last day to:

- meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan - June 30, 2015
- file ADR Certification signed by Parties and Counsel
- file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference
- File Rule 26(f) Report, complete initial disclosures and File Case Management Statement - July 14, 2015
- Initial Case Management Conference 2:00 p.m. - Courtroom 2, 17th Floor, San Francisco. - July 21, 2015

3. Since the time of the May 12, 2015 Order, the parties have remained in active settlement discussions and are now in the final stages of negotiations. A draft Settlement Agreement was presented to Defendant's Board of Supervisors at its meeting on June 23, 2015. A final Agreement will need the approval and signature of Defendant's Board of Supervisors. The next scheduled Board of Supervisors meeting takes place on July 21, 2015 at 8:30 a.m.

4. Under the current Order, the parties are required to meet and confer under FRCP 26(f) by June 30, 2015. An Initial Case Management Conference is scheduled for July 21, 2015. I am requesting all deadlines be further extended for a period of thirty (30) days to allow the parties time to present a final Agreement to Defendant's Board of Supervisors for approval and

1 signature. The continuance requested will not hinder or harm any proceedings in this matter.

2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct and that this declaration was executed in Santa Rosa, California on
4 June 24, 2015.

5 /s/ Jerry Bernhaut
6 JERRY BERNHAUT

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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, it is hereby,
ORDERED, that the deadlines set forth in the Order Setting Initial Case Management Conference and ADR Deadlines be further extended as follows:

Last day to:

- meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan - August 4, 2015
- file ADR Certification signed by Parties and Counsel
- file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference
- Last day to file Rule 26(f) Report, complete initial disclosures and File Case Management Statement - August 11, 2015
- Initial Case Management Conference 2:00 p.m. - Courtroom 2, 17th Floor, San Francisco - August 18, 2015

Dated: June 25, 2016



WILLIAM H. ORRICK
United States District Judge