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Sonoma Valley County Sanitation District
7 and Sonoma County Water Agency

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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 CALIFORNIA RIVER WATCH, an IRC
Section 501(c)(3) non-profit, public benefit
12 corporation,

13 Plaintiff,

14 v.

15 SONOMA VALLEY COUNTY
SANITATION DISTRICT and SONOMA
16 COUNTY WATER AGENCY,

17 Defendants.

Case No. 15-cv-01283
Hon. William H. Orrick

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

18 Pursuant to Civil Local Rules 6-1(a) and 6-2, all parties hereby stipulate and request that
19 the Court enter an order extending Defendants' time to file an answer or other responsive
20 pleading by approximately 60 days.

21 **RECITALS**

22 Good cause exists for the request, as follows:

23 WHEREAS, Plaintiff served its Complaint on the Sonoma Valley County Sanitation
24 District on July 13, 2015;

25 WHEREAS, Defendants currently have until August 4, 2015 to answer or respond to the
26 Complaint;

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1 WHEREAS, the parties have been meeting regularly to negotiate a settlement;
2 WHEREAS, the parties are very close to negotiating final terms of a settlement;
3 WHEREAS, once a settlement is reached, a 45 day review period for the Department of
4 Justice is required before the settlement can be finalized;¹

5 WHEREAS, Defendants have requested and Plaintiff has consented to an additional 60
6 days to answer or respond to the Complaint;

7 WHEREAS, the dates currently set by Court order include the deadline for the Case
8 Management Statement (August 11, 2015); the deadline for the Rule 26 Meeting Report (August
9 11, 2015); and the Initial Case Management Conference (August 18, 2015); and

10 WHEREAS, a 60-day extension would change these dates currently set by Court order to
11 the following approximate dates: Case Management Statement deadline to approximately
12 October 12, 2015; Rule 26 Meeting Report deadline to approximately October 12, 2015; and
13 Initial Case Management Conference to approximately October 19, 2015.

14 **STIPULATION**

15 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
16 through their respective counsel, that Defendants shall answer or otherwise respond to Plaintiff's
17 Complaint by October 5, 2015.

18 Dated: July 21, 2015

SONOMA COUNTY COUNSEL'S OFFICE

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20 By: _____/s/_____

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DAVID R. MCFADDEN
Deputy County Counsel
Sonoma County Counsel's Office
Attorneys for Defendants Sonoma Valley
County Sanitation District and Sonoma
County Water Agency

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¹ Title 33 of the United States Code Section 1365(c)(3) provides, "No consent judgment shall be entered in an action in which the United States is not a party prior to 45 days following the receipt of a copy of the proposed consent judgment by the Attorney General and the Administrator."

1 Dated: July 21, 2015

LAW OFFICE OF JACK SILVER
Attorneys for Plaintiff California River Watch

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By: _____/s/_____

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Jerry Bernhaut, Esq.

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ORDER

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Pursuant to the foregoing stipulation to extend time for Defendants to answer or
9 otherwise respond to Plaintiff's complaint and good cause appearing, it is hereby ORDERED
10 that Defendants' deadline to respond to Plaintiff's Complaint is extended to October 5, 2015.
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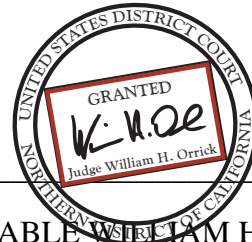
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IT IS SO ORDERED.

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Dated: July 24, 2015 _____



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HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE

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