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6 Attorneys for Plaintiff
 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.: August 18, 2015

17 Plaintiff CALIFORNIA RIVER WATCH hereby moves for relief from the Court's Order
 18 of June 25, 2015 re-setting the Initial Case Management Conference and ADR Deadlines (Dkt
 19 #11) in that Plaintiff moves to further extend all deadlines for a period of sixty (60) days.

21 Dated: August 5, 2015

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

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1 **DECLARATION OF JERRY BERNHAUT**

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

5 2. A previous Expedited Motion for Relief was filed on behalf of Plaintiff on June
6 24, 2015 (Dkt # 10). At that time, the parties and their respective counsel were continuing in
7 settlement discussions and had drafted a Settlement Agreement for presentation to Defendant’s
8 Board of Supervisors. The Court issued its Order (Dkt #11) further extending the deadlines set
9 forth in the Order Setting Initial Case Management Conference and ADR Deadlines as follows:

10 Last day to:

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

19 3. Following the June 25, 2015 Order, Defendants were served with the Complaint
20 in order to comply with the mandates of Rule 4. As the parties continue in the final stages of
21 negotiations, Plaintiff agreed to extend the time within which Defendant may respond to the
22 Complaint (served on Defendants on July 13, 2015) for a period of sixty (60) days. Defendant
23 filed a Stipulation to that effect indicating that granting the Stipulation would change the dates
24 currently set by the Court in its June 25, Order; and, advising the Court of the U.S. Department
25 of Justice’s 45-day review period required for any settlement reached, pursuant to 33 U.S.C.
26 §1365(c)(3) (Dkt # 14). The Court issued its Order extending Defendant’s deadline to respond
27 to the Complaint to October 5, 2015.

1 4. In lieu of the above, I am requesting all deadlines be further extended for a period
2 of sixty (60) days. The continuance requested will not hinder or harm any proceedings in this
3 matter.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct and that this declaration was executed in Santa Rosa, California on
6 August 5, 2015.

7 */s/ Jerry Bernhaut*
8 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 - October 05, 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 - October 12, 2015
- Initial Case Management Conference - October 20, 2015
2:00 p.m. - Courtroom 2, 17th Floor, San Francisco

Dated: August 12, 2015



WILLIAM H. ORRICK
United States District Judge