

Deadline	Current date	New date
Defendants' combined opposition and cross-motion for summary judgment.	September 28, 2016	October 17, 2016
Defendant-intervenors' combined opposition and cross-motion for summary judgment.	September 28, 2016	October 17, 2016
Plaintiffs' combined opposition/reply.	November 16, 2016	December 5, 2016
Defendants' reply.	December 21, 2016	December 23, 2016
Defendant-intervenors' reply.	December 21, 2016	December 23, 2016
Hearing on the parties' motions for summary judgment.	January 26, 2017, at 2:00 p.m.	January 26, 2017, at 2:00 p.m. (no change)

In support of this Stipulation the parties state as follows:

1. Undersigned counsel for federal defendants has been unexpectedly required to present oral argument in two other matters on August 30 and September 29, 2016.
2. Defendant-intervenors' undersigned lead counsel is also lead counsel for proposed intervenors in a matter recently filed in the Eastern District of Washington, where a motion for preliminary injunction was unexpectedly filed September 6, 2016 and has been set for hearing October 3, 2016. Additionally, while the previous briefing schedule accommodated expected paternity leave for defendant-intervenors' counsel, that paternity leave unexpectedly extended a week later than previously anticipated.
3. The above obligations interfere with defendants' and intervenors' counsels' preparation of their opening briefs in this matter, and a brief extension of the opening brief deadline, from September 28 to October 17, would ensure there is sufficient time for counsel to prepare the briefing.

- 1 4. Additionally, the parties have agreed to extend plaintiffs' reply deadline in order to
2 accommodate the extension to defendants' and defendant-intervenors' briefing, and to
3 extend the deadline for defendants' and defendant-intervenors' replies by two days.
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5 5. If approved, this Stipulation would have no effect on the hearing presently scheduled for
6 January 26, 2017, at 2:00 p.m.
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8 6. The parties have jointly requested one previous continuance of the briefing schedule,
9 which the Court granted in its Order of June 1, 2016 (ECF No. 51).

10 Accordingly, the parties request the Court approve this Stipulation, and enter the
11 proposed changes to the briefing and hearing schedule.

12 Respectfully submitted this 13th day of September, 2016.

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14 Assistant Attorney General
15 Environment & Natural Resources Division
16 SETH M. BARSKY, Chief
17 MEREDITH L. FLAX, Assistant Chief

18 /s/ Nicole M. Smith (by LEF, as authorized 9/13/16)

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17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

18 Dated: September 14, 2016

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20 Hon. John S. Tigar
21 United States District Judge
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