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10 *Attorneys for Federal Defendants*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**
14

15	HOOPA VALLEY TRIBE,)	Case No. 3:16-cv-04294-WHO
16)	
17	Plaintiff,)	STIPULATED EXTENSION OF TIME
18)	FOR FEDERAL DEFENDANTS'
19	v.)	RESPONSIVE PLEADING AND CASE
20)	MANAGEMENT DEADLINES
21	U.S. BUREAU OF RECLAMATION, et al.,)	
22)	
23	Defendants,)	
24)	
25	and)	
26)	
27	KLAMATH WATER USERS)	
28	ASSOCIATION, et al.,)	
)	
	Defendant-Intervenors.)	

1 Pursuant to Civil Local Rule 6-2, Plaintiff, Federal Defendants, and Defendant-
2 Intervenors hereby jointly stipulate to a two-week extension of all existing deadlines in this
3 case, including the following:

- 4 • April 3, 2017 – Deadline for Federal Defendants to answer or otherwise respond to
5 Plaintiff’s Second Amended Complaint (Dckt. No. 87);
- 6 • April 21, 2017 – Last day to: file Rule 26(f) Report, complete initial disclosures or
7 state objection in Rule 26(f) report,¹ and file Case Management Statement per
8 Standing Order re Contents of Joint Case Management Statement;
- 9 • April 28, 2017 – Deadline to participate in ADR Phone Conference; and
- 10 • May 2, 2017 – If necessary, Initial Case Management Conference.

11 Dckt. No. 104.²

12 Good cause exists for the requested extension because the parties are currently
13 discussing possible resolution of the remaining claims in this case following entry of the
14 Court’s February 8, 2017 and March 24, 2017 Orders. Dckt. Nos. 102 & 111.

15 WHEREFORE, the parties hereby stipulate to extend, by two weeks, each of the
16 aforementioned deadlines to facilitate ongoing discussions, as follows:

- 17 • April 17, 2017 – Deadline for Federal Defendants to answer or otherwise respond to
18 Plaintiff’s Second Amended Complaint (Dckt. No. 87);
- 19 • May 5, 2017 – Last day to: file Rule 26(f) Report, complete initial disclosures or state
20 objection in Rule 26(f) report, and file Case Management Statement per Standing
21 Order re Contents of Joint Case Management Statement;
- 22 • May 12, 2017 – Deadline to participate in ADR Phone Conference; and
- 23 • May 16, 2017 – If necessary, Initial Case Management Conference.

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26 ¹ Federal Defendants preserve for the record their objection to this case being subject to initial
27 disclosures and all other discovery related deadlines on the grounds that this is an action for
28 review on an administrative record. *See* Fed. R. Civ. P. 26(a)(1)(A); (a)(1)(B)(i); (f)(1).

² The Court established the aforementioned deadlines on February 22, 2017 by approving of
the parties’ previous stipulated extension. Dckt. No. 104.

1 Dated: March 31, 2017

2 Respectfully submitted,

3 JEFFREY H. WOOD, Acting Assistant Attorney General
4 SETH M. BARSKY, Chief
5 S. JAY GOVINDAN, Assistant Chief
6 ROBERT P. WILLIAMS, Sr. Trial Attorney

7 /s/ Kaitlyn Poirier

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2 /s/ Paul S. Simmons
3 Paul S. Simmons

4 *Attorneys for Defendant-Intervenors Klamath Water Users*
5 *Association, Sunnyside Irrigation District, and Ben DuVal*

6 CLYDE SNOW & SESSIONS, P.C.

7 /s/ Reagan L.B. Desmond
8 Reagan L. B. Desmond

9 *Attorneys for Defendant-Intervenor Klamath Drainage District*

10 WANGER JONES HELSLEY PC

11 /s/ John P. Kinsey
12 John P. Kinsey

13 *Attorneys for Defendant-Intervenors Klamath Irrigation*
14 *District and Pine Grove Irrigation District*

15 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

16 I, Kaitlyn Poirier, attest that concurrence in the filing of the document has been
17 obtained from each of the other Signatories indicated with a “conformed” signature (/s/)
18 within this e-filed document.

19 I declare under penalty of perjury under the laws of the United States of America that
20 the foregoing is true and correct to the best of my knowledge.

21 Dated: March 31, 2017

22 /s/ Kaitlyn Poirier
23 KAITLYN POIRIER, Trial Attorney
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25 Environment and Natural Resources Division
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Attorneys for Federal Defendants

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 Dated this 31st day of March, 2017.

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6 _____
7 HON. WILLIAM H. ORRICK
8 United States District Judge
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