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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 YUROK TRIBE, et al.,)
16 Plaintiffs,) Case No. 3:16-cv-06863-WHO
17 v.) **STIPULATED EXTENSION OF TIME**
18 U.S. BUREAU OF RECLAMATION, et al.,) **FOR FEDERAL DEFENDANTS’**
19 Defendants,) **RESPONSIVE PLEADING AND CASE**
20 and) **MANAGEMENT DEADLINES**
21 KLAMATH WATER USERS)
22 ASSOCIATION, et al.,)
23 Defendant-Intervenors.)
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1 Pursuant to Civil Local Rule 6-2, Plaintiffs, 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 Plaintiffs’ Complaint (Dckt. No. 59);
- 6 • April 7, 2017 – Last day to: meet and confer re: initial disclosures¹, early settlement,
7 ADR process selection, and discovery plan; file ADR Certification signed by Parties
8 and Counsel; and file either Stipulation to ADR Process or Notice of Need for ADR
9 Phone Conference (Dckt. No. 61);
- 10 • April 21, 2017 – Last day to: file Rule 26(f) Report, complete initial disclosures or
11 state objection in Rule 26(f) report, and file Case Management Statement per Standing
12 Order re Contents of Joint Case Management Statement (Dckt. No. 61);
- 13 • May 2, 2017 – Initial Case Management Conference (Dckt. No. 61).

14 Good cause exists for the requested extension because the parties are currently
15 discussing possible resolution of the remaining claims in this case following entry of the
16 Court’s February 8, 2017 and March 24, 2017 Orders. Dckt. Nos. 62 & 70.

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

- 19 • April 17, 2017 – Deadline for Federal Defendants to answer or otherwise respond to
20 Plaintiffs’ Complaint;
- 21 • April 21, 2017 – Last day to: file Rule 26(f) Report, complete initial disclosures or
22 state objection in Rule 26(f) report, and file Case Management Statement per Standing
23 Order re Contents of Joint Case Management Statement;

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

- 1 • May 5, 2017 – Last day to: file Rule 26(f) Report, complete initial disclosures or state
2 objection in Rule 26(f) report, and file Case Management Statement per Standing
3 Order re Contents of Joint Case Management Statement; and
4 • May 16, 2017 – Initial Case Management Conference.
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6 Dated: March 31, 2017

7 Respectfully submitted,

8 JEFFREY H. WOOD, Acting Assistant Attorney General
9 SETH M. BARSKY, Chief
10 S. JAY GOVINDAN, Assistant Chief
11 ROBERT P. WILLIAMS, Sr. Trial Attorney

12 /s/ Kaitlyn Poirier

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15 /s/ Paul S. Simmons
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18 *Association, Sunnyside Irrigation District, and Ben DuVal*

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20 /s/ Reagan L.B. Desmond
21 Reagan L. B. Desmond

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23 WANGER JONES HELSLEY PC

24 /s/ John P. Kinsey
25 John P. Kinsey

26 *Attorneys for Defendant-Intervenors Klamath Irrigation*
27 *District and Pine Grove Irrigation District*

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

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

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


7 Dated: March 31, 2017

8 /s/ Kaitlyn Poirier
9 KAITLYN POIRIER, Trial Attorney
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11 Environment and Natural Resources Division
12 Wildlife and Marine Resources Section
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18 *Attorneys for Federal Defendants*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 Dated this 31st day of Marh, 2017.

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