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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

JUDY BUNDORF, an individual; FRIENDS OF SEARCHLIGHT DESERT AND MOUNTAINS; BASIN AND RANGE WATCH; ELLEN ROSS, an individual; and RONALD VAN FLEET, SR., an individual,

Plaintiffs.

v.

S.M.R. JEWELL, Secretary of the Interior, BUREAU OF LAND MANAGEMENT, U.S. FISH & WILDLIFE SERVICE,

Defendants.

No. 2: 13-cy-00616

UNOPPOSED MOTION FOR EXTENSION OF TIME

(Second Request)

Pursuant to Local Rules 6-1(b) and 6-2(a) and Judge Du's Civil Standing Order, Federal

Defendants S.M.R. Jewell, Secretary of the Interior, Bureau of Land Management ("BLM"), and

U.S. Fish and Wildlife Service ("FWS") hereby request an extension of time to file their points and authorities in response to Plaintiffs' Motion to Vacate (ECF No. 99), Motion for Permenent Injunction (ECF No. 100), and Motion for Clarification of Order (ECF No. 101), revising the briefing schedule to reflect the response will be due March 26, 2015. Intervenor-Defendant requests an equivalent extension to March 26, 2015 for its response to Plaintiffs' motions. Finally, Plaintiffs request an extension to April 17, 2015 to file their reply brief. Undersigned counsel for Federal Defendants have conferred with counsel for Defendant-Intervenor and for Plaintiffs, who have indicated that they concur in the revised schedule and do not oppose this motion.

Federal Defendants have requested one previous extension in this case for a prior summary judgment brief deadline, which Intervenor-Defendant joined and which the Court granted. (ECF Nos. 50, 52). The Court has granted three previous extensions to Plaintiffs on prior deadlines, including an extension of their deadlines to response to Federal Defendants' Cross-Motion for Summary Judgment and Motion to Strike. (*See* ECF Nos. 33, 69), as well as a Motion to Extend Time to File Bill of Costs (ECF No. 92).

The extension requested in this motion is necessary due to counsel's litigation obligations in other cases, including *Friends of Animals v. Jewell*, No. 15-cv-0016 (D. D.C.); *Bishop v. Bostick*, No. 13-cv-0082 (N.D. Tex.) and *No Casino in Plymouth v. Jewell*, No. 12-cv-1748 (E.D. Cal.). Granting this motion will not prejudice any party and will not affect any subsequent court-ordered deadlines.

Accordingly, Federal Defendants respectfully request that the upcoming deadlines be revised as follows:

Event	Current Deadline	Requested Extension
Federal Defendants' and Defendant- Intervenor's response to Plaintiffs' motions (ECF Nos. 99-101):	March 18, 2015	March 26, 2015
Plaintiffs' reply in support of motions (ECF Nos. 99-101):	March 25, 2015	April 17, 2015

For the foregoing reasons, Federal Defendants respectfully request that this Court grant this unopposed motion.

Respectfully Submitted,

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/s/ Jeremy Hessler

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OF COUNSEL

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DATED: March 12, 2015

IT IS SO ORDERED:

Miranda M. Du United States District Judge

March 13, 2015

DATED:

2:13-cv-616-MMD-