

ROBERT G. DREHER, Acting Assistant Attorney General  
 United States Department of Justice  
 Environment & Natural Resources Division

SETH M. BARSKY, Section Chief  
 S. JAY GOVINDAN, Assistant Section Chief  
 JAMES A. MAYSONETT, Senior Trial Attorney  
 Wildlife & Marine Resources Section  
 P.O. Box 7611, Washington D.C. 20044  
 (202) 305-0216, facsimile (202) 305-0275  
[james.a.maysonett@usdoj.gov](mailto:james.a.maysonett@usdoj.gov)

MAUREEN E. RUDOLPH, Senior Trial Attorney  
 TY BAIR, Trial Attorney  
 Natural Resources Section  
 P.O. Box 7611, Washington, D.C. 20044-7611  
 (202) 514-2795, facsimile (202) 305-0506  
 COUNSEL FOR FEDERAL DEFENDANTS  
 Attorneys for the Federal Defendants

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-cv-00616

UNOPPOSED MOTION FOR  
 EXTENSION OF TIME AND  
 REVISED SCHEDULING ORDER

(First Request)

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 a four-week

extension of time to file their opening summary judgment brief and for an Order revising the briefing schedule for cross-motions for summary judgment, pursuant to Local Rules 6-1(b) and 6-2(a) and Judge Du's Civil Standing Order. Undersigned counsel for Federal Defendants have conferred with counsel for Defendant-Intervenor, who have indicated that they concur in the revised schedule and do not oppose this motion. Counsel for Plaintiffs have indicated that they do not oppose this motion, but that the proposed extension may result in Plaintiffs requesting some extension of their revised Response deadline once their counsel's schedule in April and May becomes more clear.

Federal Defendants have not requested any previous extensions in this case. The Court has granted one previous extension to Plaintiffs, at which time the Court entered a revised scheduling order (ECF No. 33).

The extension requested in this motion is necessary due to counsel's litigation obligations in other cases, including *Sierra Club v. Bostick*, No. 13-cv-1239 (D. D.C.); *Bettor Racing v. NIGC*, No. 13-cv-4051 (D. S.D.); *Friends of the Wild Swan v. Jewell*, No. 9:13-cv-00061-DWM (D. Mont.). Granting this motion will not prejudice any party and will not affect any court-ordered deadline aside from those set forth in the proposed revised briefing schedule below. Accordingly, Federal Defendants respectfully request an extension of their deadline to cross-move for summary judgment, with that deadline and the subsequent deadlines to be revised as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Requested Extension</b>
Federal Defendants' (and Intervenor's) cross-motion and response:	March 14, 2014	April 11, 2014
Plaintiffs' response and reply:	April 4, 2014	May 2, 2014

Federal Defendants' (and Intervenor's) reply: April 25, 2014 May 23, 2014

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

Respectfully Submitted,

Robert G. Dreher  
Acting Assistant Attorney General  
United States Department of Justice  
Environment & Natural Resources Division

Seth M. Barsky, Section Chief  
S. Jay Govindan, Assistant Section Chief  
James A. Maysonett, Senior Trial Attorney  
Wildlife & Marine Resources Section  
P.O. Box 7611, Washington D.C. 20044  
(202) 305-0216, facsimile (202) 305-0275  
james.a.maysonett@usdoj.gov

/s/ Ty Bair  
Maureen E. Rudolph, Senior Trial Attorney  
Ty Bair, Trial Attorney  
Natural Resources Section  
P.O. Box 7611, Washington, D.C. 20044-7611  
(202) 514-2795, facsimile (202) 305-0506  
Counsel for Federal Defendants  
Attorneys for the Federal Defendants

OF COUNSEL

Janell Bogue  
Gregory Russell  
Office of the Solicitor  
U.S. Department of Interior

DATED: March 11, 2014

Dated: March 11, 2014

IT IS SO ORDERED



U.S. District Judge