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15 *Attorneys for the United States*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 CENTER FOR BIOLOGICAL DIVERSITY,
19 Plaintiff,

20 v.

21 UNITED STATES BUREAU OF LAND
MANAGEMENT, *et al.*,
22 Defendants.

) Case No. 2:14-cv-00226-APG-VCF
) Related Case No. 2:14-cv-00228-APG-VCF
) (Consolidated)

) **FEDERAL DEFENDANTS' UNOPPOSED**
) **MOTION FOR AN EXTENSION**
) **OF TIME TO RESPOND TO**
) **PLAINTIFFS' COMPLAINTS**
) **(First Request)**

23 _____
24 WHITE PINE COUNTY, *et al.*,
25 Plaintiff,

26 v.

UNITED STATES BUREAU OF LAND

1 MANAGEMENT, *et al.*,)
2 Defendants.)
3)
4)

5 Federal Defendants U.S. Bureau of Land Management (“BLM”) and the U.S. Department of
6 the Interior respectfully move for an extension of time to respond to the complaints filed by Plaintiff
7 Center for Biological Diversity and Plaintiffs White Pine County *et al.* in these consolidated cases.
8 The responses to the complaints are currently due by April 21, 2014. Federal Defendants request that
9 the due date be extended by 30 days to May 21, 2014. This is Federal Defendants first request for an
10 extension of time, and the requested extension would not affect any other deadlines in the case.
11 Federal Defendants have conferred with counsel for Plaintiff Center for Biological Diversity and for
12 Plaintiffs White Pine County *et al.*, and both sets of Plaintiffs do not oppose this request.

13 The two consolidated cases both challenge the U.S. BLM’s approval of right of way
14 application submitted by the Southern Nevada Water Authority for the Clark, Lincoln, and White Pine
15 Counties Groundwater Development Project. The complaints raise numerous factual allegations and
16 legal theories. The *White Pine County* complaint is 265 paragraphs long and contains fourteen
17 separate claims for relief. The *Center for Biological Diversity* complaint is 130 paragraphs long and
18 contains seven separate claims for relief. Given the length and detailed nature of the complaints and
19 the numerous legal issues that are raised in the complaints, Federal Defendants need additional time to
20 examine the Plaintiffs’ allegations and to formulate their responses.

21 Accordingly, Federal Defendants request an additional 30 days to respond to the complaints in
22 these consolidated cases up to and including May 21, 2014.

23 Respectfully submitted this 27th day of March 2014.

24 DANIEL G. BOGDEN
25 United States Attorney
26 BLAINE T. WELSH
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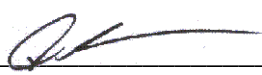
ROBERT G. DREHER

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Acting Assistant Attorney General
Environment and Natural Resources Division

/s/ Luther L. Hajek
LUTHER L. HAJEK
Trial Attorney, Natural Resources Section
United States Department of Justice
Environment and Natural Resources Division

IT IS SO ORDERED


UNITED STATES DISTRICT JUDGE

DATED: April 10, 2014