

1 Curtis Berkey, *pro hac vice*
 Rovianne A. Leigh, *pro hac vice*
 2 Scott W. Williams, *pro hac vice*
 Berkey Williams LLP
 3 2030 Addison Street, Suite 410
 Berkeley, California 94704
 4 Telephone: (510) 548-7070
 Facsimile: (510) 548-7080
 5 E-mail: cberkey@berkeywilliams.com
 E-mail: swilliams@berkeywilliams.com
 6 E-mail: rleigh@berkeywilliams.com

7 Julie Cavanaugh-Bill (NV Bar No. 11533)
 Cavanaugh-Bill Law Offices, LLC
 8 Henderson Bank Building
 401 Railroad Street, Suite 307
 9 Elko, Nevada 89802
 Telephone: (775) 753-4357
 10 E-mail: julie@cblawoffices.org

11 Attorneys for Plaintiff, Confederated Tribes
 of the Goshute Reservation

12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE DISTRICT OF NEVADA**
 14 **SOUTHERN DIVISION**

15 CENTER FOR BIOLOGICAL DIVERSITY,
 et al.

16 Plaintiffs,

17 v.

18 UNITED STATES BUREAU OF LAND
 MANAGEMENT; and UNITED STATES
 19 DEPARTMENT OF THE INTERIOR,

20 Defendants.

21 WHITE PINE COUNTY, et al.,

22 Plaintiffs,

23 v.

24 UNITED STATES BUREAU OF LAND
 MANAGEMENT, et al.,

25 Defendants

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

**PLAINTIFF CONFEDERATED
 TRIBES OF THE GOSHUTE
 RESERVATION'S UNOPPOSED
 MOTION FOR EXTENSION OF
 TIME TO RESPOND TO
 FEDERAL DEFENDANTS'
 PARTIAL MOTION TO
 DISMISS
 (First Request)**

ORDER

27 PLAINTIFF CTGR'S UNOPPOSED
 28 MOTION FOR EXTENSION OF TIME

Case No. 2:14-cv-00226-APG-VCF

1 Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Confederated Tribes of the
2 Goshute Reservation (hereafter "CTGR" or "Tribes"), moves for a three week extension of time
3 to file its response to the Federal Defendants' Partial Motion to Dismiss to July 14, 2014. This is
4 CTGR's first motion for such an extension. Federal Defendants do not oppose this motion.

5 In support of this motion, the CTGR states as follows:

6 1. An additional three weeks (21 days) will ensure that Counsel for the Tribes will
7 have sufficient time to consult with the governing body of the CTGR ("Tribal Council")
8 regarding the preparation of the response. An extension of time will also provide CTGR with
9 sufficient time to consult with the Ely Shoshone and Duckwater Shoshone Tribes regarding the
10 preparation of the response.

11 2. The Federal Defendant's Partial Motion to Dismiss was initially filed under an
12 incorrect case number (2:14-cv-00228-ASB) on June 4, 2014, and CTGR did not receive formal
13 notice of that filing. The Motion was later refiled under the correct case number (2:14-cv-00226-
14 APG-VCF) on June 10, 2014, and CTGR was properly noticed at that time.

15 3. Counsel for CTGR conferred with counsel for Federal Defendants regarding this
16 request. Legal counsel for Federal Defendants stated that defendants do not oppose this motion
17 for an extension of time.

18 4. CTGR believes that the requested extension is reasonable and will not unduly
19 delay the proceedings in this matter.

20
21
22
23
24
25 ///

1 For these reasons, CTGR respectfully requests that this Court find good cause to grant its
2 request and extend the Tribe's response deadline to the Defendant's Partial Motion to Dismiss up
3 to, and including, July 14, 2014.

4
5 DATED: June 18, 2014

6 Respectfully submitted,
7 BERKEY WILLIAMS LLP

8 */s/ Rovianna A. Leigh*


9

Curtis Berkey, *pro hac vice*
10 Rovianna A. Leigh, *pro hac vice*
11 Scott W. Williams, *pro hac vice*
Berkey Williams LLP
2030 Addison Street, Suite 410
12 Berkeley, California 94704
Telephone: (510) 548-7070
13 Facsimile: (510) 548-7080
E-mail: cberkey@berkeywilliams.com
14 E-mail: swilliams@berkeywilliams.com
E-mail: rleigh@berkeywilliams.com

15 Attorneys for Plaintiff Confederated
16 Tribes of the Goshute Reservation

17 **ORDER**

18 **IT IS SO ORDERED** this 19th day of June, 2014.

19 
20

UNITED STATES DISTRICT JUDGE