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

17 _____)
 BASIN AND RANGE WATCH,)
 18 Plaintiff,)
 19 v.)
 20 BUREAU OF LAND MANAGEMENT)
 AND THE U.S. DEPARTMENT OF THE)
 21 INTERIOR,)
 22 Defendants.)
 23 _____)

Civil Action No.: 2:16-cv-00403 JCM-PAL

STIPULATION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO REOPEN
DISCOVERY
(SECOND REQUEST)

24 Plaintiff Basin and Range Watch and Defendants Bureau of Land Management and U.S.
 25 Department of the Interior filed a Motion to Reopen Discovery (ECF# 32) on **December 9, 2016**. On
 26 **December 15, 2016**, the Court granted the parties' first request for extension of the briefing deadlines

1 (ECF #35). The current deadlines call for the United States' response on **January 9, 2017**, and
2 Plaintiff's reply on **January 23, 2017**.

3 The parties have engaged in substantive discussions to resolve the matters at issue in the Motion
4 to Reopen Discovery. Both parties are hopeful that they will be able to reach an agreement that will
5 obviate the need for further briefing on this Motion. Accordingly, the parties request that the Court
6 permit them to modify the briefing schedule as follows:

7 **January 23, 2017** – United States Opposition to the Motion to Reopen Discovery

8 **February 8, 2017** – Plaintiff's Reply in Support of Motion to Reopen Discovery

9 The extension requested is not for purposes of delay and is sought in good faith. This will give
10 the parties sufficient time to work toward a resolution of the matters at issue in this motion, including
11 obtaining client approval and crafting an appropriate stipulation. In the event that the parties are unable
12 to resolve the issue without going forward on the Motion, this schedule will allow them to fully brief the
13 issues and file their responses.

14 Respectfully submitted this 9th day of January 2017.


15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/ Troy K. Flake
18 Troy K. Flake
19 Assistant United States Attorney
20 *Of Attorneys for Federal Defendants*

/s/ David H. Becker
David H. Becker, Esq., *Pro Hac Vice*
Of Attorneys for Plaintiff

It is so ordered.

21 Date: January 10, 2017


United States Magistrate Judge