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**UNITED STATES DISTRICT COURT
DISTRICT OF, NEVADA**

HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
ENTERPRISE, LLC.,
Plaintiffs,

AMERICAN BORATE COMPANY a foreign corporation; AMERICAN BORATE COMPANY OF TEXAS a foreign corporation, STATE ENGINEER, STATE OF NEVADA, DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES, DIVISION OF WATER RESOURCES, A Nevada Political Subdivision; RAMM Corporation, a Nevada Corporation; UNITED STATES FISH AND WILD SERVICE a division of the UNITED STATES; NATIONAL PARK SERVICE, a division of the UNITED STATES; and DOES I-V, ROES VI-X,

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE TO UNITED
STATES FISH AND WILDLIFE SERVICE
AND THE NATIONAL PARK SERVICE
MOTION TO DISMISS
(SECOND REQUEST)**

Defendants.

COMES NOW, Plaintiffs and Defendants United States Fish and Wildlife Service and the National Park Service (collectively, “Federal Defendants”) by and through their respective attorneys of record hereby stipulate and agree as follows:

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On June 21, 2021, the Federal Defendants filed a Motion to Dismiss (“Motion”). See (ECF No. 17). Plaintiff’s response to the Motion was due on July 6, 2021. The parties agreed to extend the response deadline to July 14, 2021. See (ECF No. 24). The parties also stipulated that the Federal Defendants’ Reply would be due on July 26, 2021. Id. The Court granted the stipulation See (ECF No. Dkt No 26).

The parties make this second request to accommodate workload and scheduling conflicts for Plaintiff's counsel, which could not be resolved during the first extension. The parties have agreed Plaintiff would have until July 21, 2021 to respond, and the Federal Defendants would have to August 13, 2021 to file a Reply. The additional time for the Reply is needed so as not to prejudice the Federal Defendants as their counsel will be in depositions from July 26, 2021-August 6, 2021.

LAW OFFICES OF BYRON THOMAS

/s/ David L. Negri

/s/ Byron E. Thomas

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IT IS SO ORDERED.

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DATED: July 15, 2021