

1 **COUNSEL IDENTIFICATION ON FINAL PAGE**

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3 **UNITED STATES DISTRICT COURT**
4 **EASTERN DISTRICT OF CALIFORNIA**

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9 **THE CONSOLIDATED DELTA SMELT CASES**

Lead Case:
1:09-cv-407-LJO-DLB

Member Cases:
1:09-cv-422-LJO-DLB
1:09-cv-631-LJO-DLB
1:09-cv-892-LJO-GSA

Partially Consolidated With:
1:09-cv-480-LJO-GSA
1:09-cv-1201-LJO-DLB

**UNOPPOSED JOINT MOTION FOR
EXTENSION OF TIME TO SUBMIT
SUPPLEMENTAL INFORMATION
IN SUPPORT OF JOINT MOTION
TO EXTEND THE REMAND
SCHEDULE (Doc. 1098)**

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19 **THE CONSOLIDATED SALMONID CASES**

Lead Case:
1:09-cv-1053-LJO-DLB

Member Cases:
1:09-cv-1090-LJO-DLB
1:09-cv-1378-LJO-DLB
1:09-cv-1520-LJO-DLB
1:09-cv-1580-LJO-DLB
1:09-cv-1625-LJO-SMS

**UNOPPOSED JOINT MOTION FOR
EXTENSION OF TIME TO SUBMIT
SUPPLEMENTAL INFORMATION
IN SUPPORT OF JOINT MOTION
TO EXTEND THE REMAND
SCHEDULE (Doc. 728)**

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In its January 30, 2013 Order, the Court directed “all Parties to work together toward the development of a joint detailed revised CSAMP [Collaborative Scientific Adaptive Management Program] proposal,” and, to that end, directed Plaintiff-Intervenor California Department of

1 Water Resources (“DWR”) and Federal Defendants (collectively, “Movants”) to submit
2 supplemental documents in support of their joint motion to extend the remand schedule in the
3 above-captioned matters on or before March 1, 2013. Doc. No. 1098 (*Consolidated Delta Smelt*
4 *Cases*, Civ. No. 09-407); Doc. No. 728 (*Consolidated Salmonid Cases*, Civ. No. 09-1053).

5 Since receiving the Court’s Order, the Federal and State agencies, along with parties
6 representing the Plaintiff water-supply contracting agencies and Defendant-Intervenors, have
7 been actively engaged in good faith negotiations towards developing a unanimous revised
8 proposal as directed by the Court, and those efforts continue. Movants are encouraged with the
9 progress of the negotiations thus far; however, no agreement has been reached as of the date of
10 this submission. Movants believe that agreement may be reached with additional time to
11 continue the ongoing negotiations, and therefore respectfully request that the Court extend the
12 March 1, 2013 deadline in its Order by a period of two weeks, to March 15, 2013. No party to
13 the litigation opposes the requested extension to March 15, 2013.

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15 Dated: February 28, 2013

KAMALA D. HARRIS
Attorney General of the State of California

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17 By: /s/ Clifford T. Lee
18 CLIFFORD T. LEE
19 ALLISON GOLDSMITH
20 Deputies Attorney General
Attorneys for Plaintiff-Intervenor CALIFORNIA
DEPARTMENT OF WATER RESOURCES

21 Dated: February 28, 2013

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Environment & Natural Resources Division
SETH M. BARSKY, Section Chief

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24 By: /s/ Robert P. Williams
25 ROBERT P. WILLIAMS, Trial Attorney
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26 /s/ Bradley H. Oliphant
27 BRADLEY H. OLIPHANT, Trial Attorney
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28 *Attorneys for Federal Defendants*

IDENTIFICATION OF COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that, on February 28, 2013, the foregoing, with supporting attachments, was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such to the attorneys of record in this matter.

/s/ Robert P. Williams
Robert P. Williams, Trial Attorney
Consolidated Delta Smelt Cases

/s/ Bradley H. Oliphant
Bradley H. Oliphant, Trial Attorney
Consolidated Salmonid Cases