

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

and

STATE OF NEW MEXICO, ex rel. STATE
ENGINEER,

Plaintiffs,

and

ZUNI INDIAN TRIBE, NAVAJO NATION

Plaintiffs-in-Intervention,

-vs-

A & R Productions, et al.,

Defendants.

No. 01cv00072-MV-WPL
Subfile No. ZRB-2-00098
JAY Land Ltd. Co., Yates
Ranch Property LLP

JOINT MOTION TO MODIFY THE ORDER OF
APRIL 6, 2015, MODIFYING SCHEDULING
ORDER DEADLINES (Doc. 3039) AND FOR
EXTENSION OF TIME IN WHICH TO FILE
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT,
RESPONSES, CROSS-MOTIONS, AND REPLIES

The parties Plaintiffs United States of America and State of New Mexico and Defendants JAY Land Ltd. Co. and Yates Ranch Property LLP, jointly move the Court to modify the **ORDER GRANTING SECOND JOINT MOTION TO MODIFY SCHEDULING ORDER DEADLINES (Doc. 3039)** by extending the deadline for these Defendants' motions for summary judgment by approximately ten (10) days, and all remaining deadlines as set forth herein:

June 26, 2015 - Defendants' Motion(s) for Summary Judgment;

August 18, 2015 - Plaintiffs' Combined Response(s) / Cross-Motion(s) for Summary Judgment;

September 2, 2015 - Defendants' Combined Reply(ies)/Cross
- Motion Response(s); and

September 18, 2015 - Plaintiffs' Cross-Motion Reply(ies).

As grounds movants would show the Court that Defendants' counsel has had family emergencies and personal medical issues simultaneously and unexpectedly arise just at the time these Defendants' motions are due; both Plaintiffs' counsel's litigation schedules are such that they require more than ten days to respond/reply, etc.

WHEREFORE the parties requestd that the Court extend the motion deadlines as set forth above.

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CERTIFICATE OF SERVICE

On June 16, 2015, I served the foregoing Second Joint Motion to Modify Scheduling Order Deadlines electronically through the Court's CM/ECF system.

/S/ Peter Shoenfeld