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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

KELSEY CASCADIA ROSE JULIANA, et al., Case No. 6:15-cv-01517-TC
Plaintiffs,

v.

**FEDERAL DEFENDANTS'
UNOPPOSED MOTION TO
ENLARGE TIME TO FILE
WRITTEN OBJECTIONS**

UNITED STATES OF AMERICA, et al.,
Federal Defendants.

**EXPEDITED HEARING
REQUESTED**

UNOPPOSED MOTION TO ENLARGE TIME TO FILE WRITTEN OBJECTIONS

Federal Defendants respectfully move the Court to enlarge their time to file objections to the findings and recommendations of the magistrate judge (ECF No. 68), which were issued on April 8, 2016. Federal Defendants seek a one-week extension of time, so that their objections are due on May 2, 2016. Under Fed. R. Civ. P. 6(b)(1), the Court may extend the time for filing the reply for good cause. The grounds for this motion are as follows:

MOT. TO ENLARGE
TIME TO FILE OBJECTIONS

1. Pursuant to Fed. R. Civ. P. 72(b)(2), the parties have 14 days to serve and file specific written objections to the magistrate's proposed findings and recommendations. And pursuant to Fed. R. Civ. P. 6(d) an additional three days are added to this period when service is made by electronic means. Federal Defendants' objections are presently due by April 25, 2016.
2. The magistrate's findings and recommendations advocate that the Court deny the Federal Defendants' motion to dismiss the complaint for lack of jurisdiction and failure to state a claim.
3. Federal Defendants believe that this case raises extraordinary and unprecedented claims. The objections to the findings and recommendations need to appropriately address the important issues in this case.
4. Plaintiffs have named 22 individual and agency defendants in this case. Representatives for each defendant will need to review Federal Defendants' objections, provide necessary feedback, and obtain approval from the appropriate agency authorities.
5. Within the Department of Justice, the Federal Defendants' objections will also need to be reviewed and receive approval from the appropriate Department of Justice authorities.
6. Federal Defendants have carefully reviewed the magistrate's findings and recommendations and are diligently preparing their objections. However, due the need to receive feedback and approval from the many defendants in this case, Federal Defendants will need a short extension of time – of one week – in order to prepare their objections.

7. Undersigned counsel conferred with counsel for Plaintiffs and Intervenor-Defendants yesterday and today regarding the need for a one-week extension. Neither Plaintiffs nor Intervenor-Defendants oppose the request for a one-week extension or the request for an expedited hearing on this motion.
8. Granting this motion will serve the public interest by ensuring that counsel for Federal Defendants has sufficient time to prepare well-researched, well-drafted, and well-edited objections, with necessary feedback from representatives of the individual and agency defendants. On the other hand, denying the motion would cause undue prejudice and harm to Federal Defendants' positions because their counsel would not have adequate time to complete the research and drafting process, submit the objections for review by representatives of the individual and agency defendants, and incorporate feedback before filing the objections.

Accordingly, Federal Defendants respectfully request an enlargement of one week to file written objections to proposed findings and recommendations, so that it is due by May 2, 2016.

Dated: April 20, 2016

Respectfully submitted,
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s/ Sean C. Duffy
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Certificate of Service

I hereby certify that on April 20, 2016, I filed the foregoing with the Clerk of Court via the CM/ECF system, which will provide service to all attorneys of record.

s/ Sean C. Duffy
Sean C. Duffy

Attorney for Federal Defendants