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UNITED STATES OF AMERICA

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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	Subcase No.: 85-00016, 85-02046, 85-02063.
	)	85-02065, 85-02146, 85-02147, 85-04483,
Case No. 39576	)	85-11087, and 85-15424
	)	
	)	SECOND JOINT MOTION FOR EXTENSION
	)	OF TIME TO FILE PROPOSED
	)	TRIAL SCHEDULES
	)	

The United States, the Nez Perce Tribe, and the Lewiston Orchards Irrigation District ("LOID") hereby jointly move this Court for an Order extending the due date for all parties to file proposed trial schedules in the listed subcases

This Court's Order dated April 6, 2006 requires the parties to file proposed trial schedules by Friday, May 19, 2005. The parties to these subcases continue to believe that so long as the parties are making progress in settling this matter it does not make sense to file a

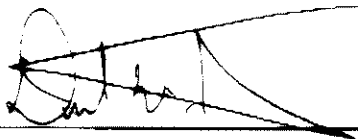
proposed trial schedule. Accordingly, the parties respectfully petition the Court for a second 60-day extension of time for filing the proposed trial schedules.

The parties previously reported that the United States had prepared a settlement offer that was awaiting approval by the LOID board of directors. That offer was transmitted to the tribe and will be considered by the Nez Perce Tribal Executive Committee at their regularly scheduled meeting on May 23, 2006. The parties have asked for a sixty day extension in order to allow time for the United States and LOID to review the Committee's response, engage in any necessary coordination with Reclamation officials and the LOID Board of Directors, and to allow the parties to jointly evaluate the prospect for continued progress toward settlement.

Accordingly, the United States, the Nez Perce Tribe, and the Lewiston Orchards Irrigation District hereby jointly petition the SRBA Court for an Order extending the deadline for all parties to submit proposed trial schedules from May 19, 2006 to July 19, 2006.

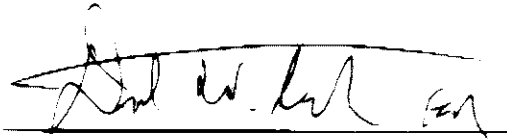
Respectfully submitted this 9th day of May, 2006.

Attorney for the United States



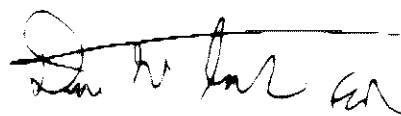
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Attorneys for the Nez Perce Tribe



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Attorney for Lewiston Orchards Irr. Dist.



Earl L. McGeoghegan

CERTIFICATE OF MAILING

I certify that on May 9, 2006, a true and correct copy of the **SECOND JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED TRIAL SCHEDULES** was served via facsimile transmission to the following:

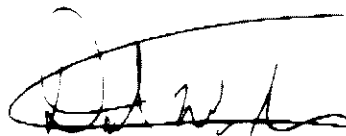
SRBA DISTRICT COURT
208-736-2121

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TO:	Diana Delaney	FAX No.	208-736-2121
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	Candice McHugh		

NUMBER OF PAGES SENT (INCLUDING COVER PAGE): 4

SPECIAL INSTRUCTIONS: Attached for filing is **Second Joint Motion for Extension of Time to File Proposed Trial Schedules** in Subcase Nos. 85-00016, 85-02049, 85-02063, 85-02065, 85-02146, 85-02147, 85-04483, 85-11087, and 85-15424. Eight additional copies will be sent by FedEx mail to satisfy the copy requirements