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Attorneys for Joyce Livestock

IN THE SUPREME COURT OF THE STATE OF IDAHO

IN RE: SRBA, CASE NO. 39586
SUBCASE NOS. 55-10135 (Joyce Livestock),
55-11061, 55-11385, 55-12452 (BLM)

MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE BRIEF

JOYCE LIVESTOCK COMPANY,

Appellant,

vs.

UNITED STATES OF AMERICA, et al.

Supreme Court No. 32278

JOYCE LIVESTOCK COMPANY,

Respondent,

vs.

UNITED STATES OF AMERICA, et al.

Appellant.

Supreme Court No. 32279

1 By Order Reinstating Appeal dated September 22, 2006, the respective reply briefs of the
2 United States and Joyce Livestock Company (Joyce Livestock) in these consolidated appeals are due
3 to be filed with the Court on October 12, 2006. Undersigned counsel has been advised that the
4 United States has filed a Motion for Extension of Time with the Court requesting that the time for
5 the United States to file its Reply Brief be extended to October 19, 2006. For the reasons outlined
6 in the accompanying Affidavit of Elizabeth P. Ewens, and specifically to avoid prejudice to Joyce
7 Livestock in these proceedings, if the United States' Motion for Extension of Time is granted then
8 Joyce Livestock moves the Court for an equal extension of time to file its Reply Brief in these
9 consolidated appeals.

10 Therefore, Joyce Livestock hereby moves the Court, pursuant to rules 32 and 34 Idaho
11 Appellate Rules, for an extension of time to and including October 19, 2006 to file Joyce
12 Livestock's Reply Brief in Supreme Court No. 32278.

13
14 Dated this 4 day of October, 2006.

15 Respectfully submitted,

16 McQUAID BEDFORD & VAN ZANDT LLP

17
18 By: 
19 Elizabeth P. Ewens
20 Michael J. Van Zandt

21 LING, ROBINSON & WALKER

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23 By: _____
24 Roger D. Ling

25 Attorneys for Joyce Livestock Co.

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Roger D. Ling

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2 **CERTIFICATE OF SERVICE**

3 I certify that on October 4, 2006, I served a true and correct copy of foregoing **MOTION**
4 **FOR EXTENSION OF TIME TO FILE REPLY BRIEF** upon the following individuals by
placing the document in the United States Mail, postage paid, and addressed as follows:

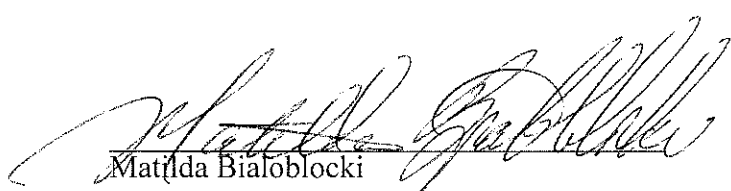
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