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Attorney for Ted Blackstock

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Department of Water Resources  
Adjudication Bureau

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ATTORNEY

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  
Case No. 39576

Subcase 57-11124 et. al.

**MOTION TO EXTEND TIME FOR  
RESPONDING TO UNITED STATES  
FIRST SET OF INTERROGATORIES,  
REQUESTS FOR ADMISSIONS AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

COMES NOW, TED BLACKSTOCK, and moves that the Court grant an extension of time for response to the United States First Set of Interrogatories, Request For Admissions and Request For Production of Documents to and including July 3, 1996, for the following reasons:

I.

From the time of filing of the United States requests for discovery, the movant's time has been heavily committed to moving livestock and other ranching chores related to allotment management. This time period is also the normal haying period of ranching operations in Owyhee County. As a result, the claimant has not had the time necessary to consult with counsel and to gather together the documents and information necessary to respond to the United States Discovery by the due date of July 1, 1996.

II.

On June 25, 1996, the claimant conferred with counsel and received specific instructions as to the documentation and information necessary to respond to discovery. This claimant, and

the other consolidated claimants, committed to trying to gather all the necessary information and documentation by the end of the week, June 29, 1996.

III.

Because of the continuing ranching chores made imminent by the temperature increases, the claimant was not able to gather all the necessary documentation, but counsel believes that the information necessary for response to the United States request for Discovery will be available in time for response by the end of the day on July 3, 1996.

IV.

The time between June 17, 1996, when discovery was served and the due date of July 1, 1996, is normally a very busy time for ranches in the area of Owyhee County in which the claimant lives and works. The increases in temperature normally experienced during this period of time make it essential that livestock movements and haying activities not be slighted. The requested extension is not for the purpose of delay, but is necessitated by the claimant's work schedule.

V.

Counsel for the United States, Paul F. Holleman, has been contacted on this date, July 1, 1996, regarding this request for extension and has stated that he does not object to entry of an order extending time for responding through July 3, 1996.

DATED: This 1<sup>st</sup> day of July, 1996.

  
RICHARD L. HARRIS

## CERTIFICATE OF SERVICE

I the undersigned do hereby certify that a true and correct copy of the foregoing instrument was served on the following this \_\_\_\_ day of July, 1996.

|                                 |       |                    |
|---------------------------------|-------|--------------------|
| SPECIAL MASTER FRITZ X HAMMERLE | _____ | United States Mail |
| Snake River Basin Adjudication  |       |                    |
| P. O. Box 2707                  | _____ | Hand Delivered     |
| Twin Falls, Idaho 83033-2707    |       |                    |
| Fax: (208) 736-2121             | _____ | Facsimile          |

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|-----------------------------------|-------|--------------------|
| CHIEF, NATURAL RESOURCES DIVISION | _____ | United States Mail |
| Office of the Attorney General    |       |                    |
| State of Idaho                    | _____ | Hand Delivered     |
| P. O. Box 44449                   |       |                    |
| Boise, Idaho 83711-4449           | _____ | Facsimile          |

|                                            |       |                    |
|--------------------------------------------|-------|--------------------|
| PAUL F. HOLLEMAN                           | _____ | United States Mail |
| Attorney for Department of Justice         |       |                    |
| General Litigation Section                 | _____ | Hand Delivered     |
| Environment and Natural Resources Division |       |                    |
| P. O. Box 663                              | _____ | Facsimile          |
| Washington, D. C. 20044-0663               |       |                    |
| Fax: (202) 305-0506                        |       |                    |

  
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