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Attorney for Ted Blackstock

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 57-00243

SECOND

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

JOYCE LIVESTOCK, CHIPMUNK GRAZING ASSOCIATION, HARRY
RICHARD BASS, RICHARD BRANDEAU, TED BLACKSTOCK, move that the Court
grant a extension for providing a response to the United States request for discovery for the
following reason:

I.

Since the first Motion to Extend Time for providing response to the United States
Request For Discovery, the moving parties have been required to spend many hours per day
fighting range fires which threatened and destroyed winter forage. The first of the fires extended
West of Swan Falls along the Snake River over the Murphy flat and covered several thousand
acres. That fire burned for the better part of six (6) days. The fire threatened and destroyed
winter feed of Joyce Livestock and all of the moving parties participated in the fire fighting
effort.

II.

The evening of July 7, 1996, another fire, caused by fire works, began to burn near the Jump Creek area involving the spring feed of the moving party Ted Blackstock. Again, much time was spent in fighting and controlling said fire.

III.

That time spent fighting fires together with the time required for re-fencing and moving cattle pursuant to BLM license requirements has deprived the moving parties of the opportunities to collect and put together all the documentation requested by the United States.

IV.

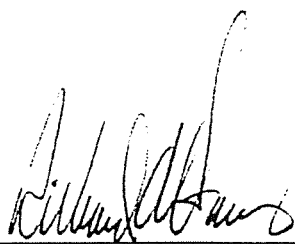
Three (3) of the parties met with Counsel all afternoon on July 8, 1996, and Counsel is now putting together the documentation thus far furnished and will be forwarding such documentation to the United States on July 15, or the morning of July 16, 1996.

Because of the emergency situation facing the moving parties they request that the Court extend the time for responding to the United States request for production and discovery until July 16, 1996. Counsel for the moving parties will send to the United States each portion of the discovery as it is completed, even before July 16, 1996.

Counsel for the United States has not indicated an intention to stipulate to this extension but has been advised of the emergency fire situation and the reason why the response to discovery has not been completed.

Wherefore the moving parties request that the Court extend the time allowed for responding to the United States request for discovery to and including July 16, 1996.

DATED: This 11 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 11 day of July, 1996.

SPECIAL MASTER FRITZ X HAMMERLE
Snake River Basin Adjudication
P. O. Box 2707
Twin Falls, Idaho 83033-2707
Fax: (208) 736-2121

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CHIEF, NATURAL RESOURCES DIVISION
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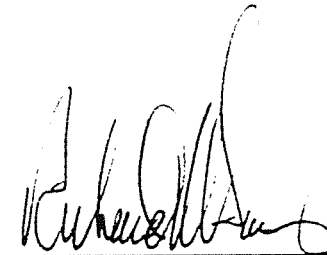
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