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DEC 31 1996

Department of Water Resources

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 Nos. 57-11124 et.al.
	)	
	)	Joint Motion to Extend Discovery Period
	)	and Motion for Expedited Consideration
Case No. 39576	)	
	)	

Descriptive Summary

This motion to extend the discovery period in the above captioned consolidated SRBA subcases is submitted jointly by Harry Richard Bass, Henry Brandau, Ted K. Blackstock, Chipmunk Grazing Association, and Joyce Livestock Company (the "Private Parties"), and by the United States. The Private Parties and the United States further request that this motion be considered in an expedited fashion.

Motion

Under the Special Master's May 10, 1996 Trial Scheduling Order, all discovery in these consolidated subcases is to be completed by September 23, 1996. For written discovery to be completed in compliance with this deadline, it must be served on or before Friday, September 6, 1996. The Private Parties and the United States urge the Special Master to extend the discovery

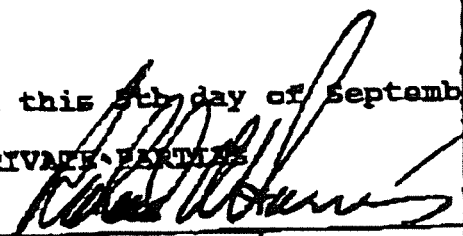
deadline in these cases until 30 days after a ruling has been issued on the motion for summary judgment currently pending before the Special Master.

The pending motion for summary judgment may resolve these contested subcases, rendering discovery unnecessary. Even if not fully dispositive, however, the decision on that motion will certainly define the issues left for trial. In either circumstance, an extended discovery deadline will save the parties significant time and expense. If the summary judgment is dispositive, an extended deadline will avoid needless discovery. If issues remain for trial, it will allow the parties to focus their discovery efforts on those remaining issues.

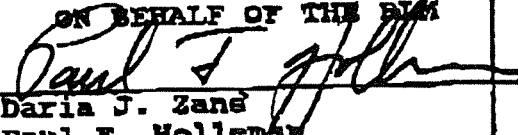
Because under the current discovery deadline written discovery needs to be served on or before September 6, 1996, the parties request this motion be heard in an expedited fashion. No oral argument is requested.

Respectfully submitted this 5th day of September, 1996.

PRIVATE PARTIES


Richard L. Harris
Attorney for Harry Richard Bass,
Henry Brandau, Ted K. Blackstock,
Chipmunk Grazing Association, and
Joyce Livestock Company

UNITED STATES OF AMERICA
ON BEHALF OF THE BLM


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