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OFFICE OF THE
ATTORNEY GENERAL

LOIS J. SCHIFFER
Assistant Attorney General
Environment and Natural Resources Division

DARIA J. ZANE
PAUL F. HOLLEMAN
Attorneys, Department of Justice
General Litigation Section
Environment and Natural Resources Division
P.O. Box 663
Washington, D.C. 20044-0663
(202) 305-0471, (202) 305-0242, (202) 305-0494

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 was to have been completed by September 23, 1996. Pursuant to the Special Master's September 5, 1996 "Order Granting Motion to Extend Discovery," the discovery deadline was extended until October 6, 1996. For written discovery to be completed in compliance with this deadline, it must be served on or before Friday, September 20, 1996. The Private Parties and the United States urge the Special Master to extend the discovery deadline in these cases until 20 days after a ruling has been issued on the motion for summary judgment currently pending before the Special Master.

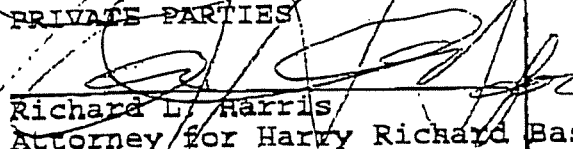
The pending motion for summary judgment may resolve these contested subcases, rendering discovery unnecessary. Even if not fully dispositive, however, the decision on that motion will certainly define the issues left for trial. In either circumstance, an extended discovery deadline will save the parties 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 20, 1996, the parties request this motion be determined in an expedited fashion. No oral argument is requested.

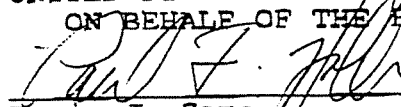
Respectfully submitted this 20th day of September,

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


Daria J. Zane
Paul F. Holleman
Attorneys, Department of Justice
ENRD GLS

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 1996, I caused a true and correct copy of the Joint Motion to Extend Discovery Period and Motion for Expedited Consideration to be served by FACSIMILE and United States mail, postage prepaid, on the following persons:

Special Master Fritz X Hammerle
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, Idaho 83303-2707

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

Richard L. Harris (Facsimile)
P.O. Box 1438
Caldwell, Idaho
83606-1438


FELECIA LESESNE