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DEPARTMENT OF
WATER RESOURCES

Counsel for Moonshine Ventures, LLC

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT FOR THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA

Case No. 39576

SUBCASES 69-4103A, 69-4103B, 69-4104A, 69-4104B and 69-4122

**FIFTH STIPULATED MOTION TO
EXTEND DEADLINE TO RESPOND
TO MOTION TO ENFORCE
SETTLEMENT AGREEMENT**

COME NOW Respondents Moonshine Ventures, LLC (“Moonshine Ventures”) and Jack Rubelt and Ava R. Rubelt (“Rubelt”), and Movant Crooked River Ranches, LLC (“CRR”), and pursuant to *Administrative Order 1* (“A.O.I.”), hereby stipulate and jointly move the Court to extend the deadline for Moonshine Ventures and Rubelt to respond to CRR’s *Motion to Enforce Settlement Agreement* (“Motion”) from September 13, 2024 to October 14, 2024 as follows:

1. CRR filed a *Motion to Enforce Settlement Agreement* (“Motion”) with this Court on March 25, 2024. On May 10, 2024 this Court issued an *Order of Reference Appointing Theodore R. Booth as Special Master* (“Order”) to preside over the above-captioned matter.
2. On May 14, 2024 the parties filed a *Stipulated Motion to Extend Deadline to respond to Motion to Enforce Settlement Agreement* (“First Stipulated Motion”), which was granted by the Court.

3. On May 28, 2024 the Court held a status conference in the above-captioned matter, at which the parties requested and Special Master Booth approved an extension of Moonshine Ventures' and Rubelt's response deadline to June 12, 2024.

4. On June 12, 2024, the parties filed a *Second Stipulated Motion to Extend Deadline to Respond to Motion to Enforce Settlement Agreement* ("Second Stipulated Motion") extending Moonshine and Rubelt's response deadline to July 12, 2024, which was granted by the Court.

5. On July 12, 2024, the parties filed a *Third Stipulated Motion to Extend Deadline to Respond to Motion to Enforce Settlement Agreement* ("Third Stipulated Motion") extending Moonshine and Rubelt's response deadline to August 13, 2024, which was granted by the Court.

6. On August 12, 2024, the parties filed a *Fourth Stipulated Motion to Extend Deadline to Respond to Motion to Enforce Settlement Agreement* ("Fourth Stipulated Motion") extending Moonshine and Rubelt's response deadline to September 13, 2024, which was granted by the Court.

7. Moonshine Ventures, Rubelt, and CRR have been engaged in settlement discussions to resolve the issues raised in the *Motion* and the parties believe that it will be judicially efficient and in the economic interests of the parties to further extend the deadline for Moonshine Ventures and Rubelt to respond to the *Motion* in order to continue settlement negotiations. The parties believe that they are close to settlement.

Accordingly, Moonshine Ventures, Rubelt, and CRR respectfully request that the Court issue an order extending the deadline by which Moonshine Ventures and Rubelt must respond to the *Motion* from September 13, 2024 to October 14, 2024.

DATED September 13, 2024.

GIVENS PURSLEY LLP

By /s/ Charlie S. Baser
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By /s/ Julie Klein Fischer
Julie Klein Fischer
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By /s/ Chris M. Bromley
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Attorney for Crooked River Ranches, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 13, 2024, the foregoing was filed, served, and copied as set out below.

DOCUMENT FILED:

Clerk of the SRBA Court
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Twin Falls, ID 83301

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/s/ Charlie S. Baser

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