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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PRESCOTT DIVISION

CENTER FOR BIOLOGICAL
DIVERSITY; SIERRA CLUB; and
GRAND CANYON WILDLANDS
COUNCIL,

Plaintiffs,

vs.

UNITED STATES FOREST
SERVICE,

Defendant.

Case No: 3:12-cv-08176-SMM

**UNOPPOSED MOTION FOR
EXTENTION OF TIME FOR
PLAINTIFFS TO RESPOND TO
PROPOSED DEFENDANT-
INTERVENORS NRA/SCI's
MOTION TO INTERVENE
(FIRST REQUEST)**

COME NOW Plaintiffs Center for Biological Diversity, Sierra Club and
Grand Canyon Wildlands Council (collectively "Plaintiffs"), by and through
undersigned counsel, and file this Unopposed Motion for Extension of Time to
Respond to Proposed Defendant-Intervenors National Rifle Association ("NRA")
and Safari Club International's ("SCI") Motion to Intervene. Plaintiffs

1 respectfully request that this Court extend the deadline to respond for 30 days,
2 until January 4, 2013. Defendant United States Forest Service (“USFS”) and
3 Proposed Defendant-Intervenors do not oppose Plaintiffs’ request. In further
4 support of this motion, Plaintiffs state the following:
5

- 6 1. On November 21, 2012, Proposed Defendant-Intervenors NRA/SCI
7 filed a Motion to Intervene and Memorandum of Points and Authorities
8 in Support Thereof (Dkt No. 28). Proposed Defendant-Intervenors
9 NRA/SCI also filed, on November 21, 2012, a Proposed Answer to
10 Plaintiffs’ Complaint (Dkt No. 39). Plaintiffs’ response is currently due
11 no later than December 5, 2012.
12
- 13 2. In support of its Motion to Intervene, Defendant-Intervenors NRA/SCI
14 filed nine declarations on a wide variety of topics (Dkt Nos. 29-37).
15
- 16 3. Plaintiffs’ requested extension is necessary to allow Plaintiffs’ counsel
17 adequate time to address the legal and factual arguments raised the
18 motion to intervene. Plaintiffs also require an extension to fully
19 evaluate the numerous declarations filed in support of Defendant-
20 Intervenor NRA/SCI’s motion, to determine whether responsive
21 declarations are required, and, if so, to prepare such responsive
22 declarations.
23
- 24 4. Undersigned counsel for Plaintiffs has conferred with counsel for
25 Defendant USFS and Proposed Defendant-Intervenors NRA/SCI and is
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1 informed that none of the parties oppose this 30-day extension.

2 5. A proposed order will be lodged simultaneously with this filing.

3 Immediately following the filing of this unopposed motion, Plaintiffs
4 will submit, via electronic mail, the proposed order to chambers.
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7 Respectfully submitted,

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9 Dated: December 3, 2012

/s/ Kevin Cassidy

10 Kevin M. Cassidy
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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2012, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing, which will send notification of such filing to the following:

Dustin Maghamfar, United States Department of Justice, Attorney for Defendant United States Forest Service.

James Odenkirk, Attorney for the State of Arizona.

C.D. Michel

Scott M. Franklin, Attorneys for National Rifle Association.

Douglas S. Burdin

Anna M. Seidman, Attorneys for Safari Club International.

Adam Keats, Attorney for Plaintiffs.

/s/ Kevin Cassidy