

1 The United States of America, on behalf of all Defendants, requests that the current
2 deadline of December 21, 2018 for the Defendants' response to Plaintiffs' Motion For
3 Preliminary Injunction (ECF No. 1-20) be extended until January 4, 2018, based upon the
4 following grounds:

5 On November 30, 2018, Plaintiffs filed its Complaint in the matter (ECF No. 1) as well
6 as its Motion For Preliminary Injunction (ECF No. 1-20).

7 On December 4, 2018, Plaintiffs' Complaint and Motion were served on Defendants by
8 certified mail. *See* Affidavit of Service (ECF No. 5).

9 Under LR 7-2(b) (response due 14 days after service of motion) and F.R.C.P. 6(d) (3
10 days added for response where service is by mail) the Defendants' response is due December 21,
11 2018.

12 Undersigned counsel was assigned this case on December 4 and has been working
13 diligently since then to coordinate with Defendant federal agencies United States Department of
14 Energy and National Nuclear Security Administration to gather and review the documentary
15 evidence related to this case and prepare the United States' response. This documentary
16 evidence includes voluminous Environmental Impact Statements spanning the last 20 years.

17 Due to pressing matters in other cases and despite continuous efforts to complete the
18 United States' response, more time is needed to complete such response.

19 Undersigned counsel has conferred with counsel for Plaintiff and has been advised that
20 Plaintiff is not able to agree to this Motion.

21 THEREFORE, the United States respectfully requests that the deadline for Defendants'
22 response to Plaintiff's Motion For Preliminary Injunction be extended until January 4. If
23 granted, Plaintiff's reply would then be due January 11. LR 7-2(b).

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of the Court and served using the CM/ECF system upon the following parties/attorneys of record:

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