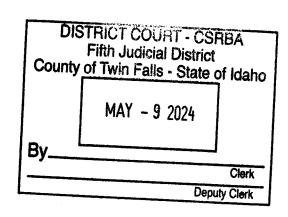
TODD KIM
Assistant Attorney General
VANESSA BOYD WILLARD
KATHERINE KANE
Indian Resources Section
Environment & Natural Resources Division
U.S. DEPARTMENT OF JUSTICE
999 18th Street, South Terrace, Suite 370
Denver, Colorado 80202
Tel. (303) 844-1353
(303) 844-1353
(303) 844-1350
Vanessa.willard@usdoj.gov
Katherine.kane@usdoj.gov



Attorneys for the United States

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

Case No. 49576

Case No. 91-7755

MOTION TO ADOPT

STIPULATION TO AMEND

LITIGATION SCHEDULE /

REQUEST FOR EXPEDITED

CONSIDERATION

The United States of America ("United States") moves the Court to enter the following amended litigation schedule based on a stipulated agreement among counsel for the following parties: the United States; Coeur d'Alene Tribe; State of Idaho; Avista Corporation; Hecla Limited; City of Coeur d'Alene; North Idaho Water Rights Group; City of St. Maries; Benewah County; City of Harrison; Buell Brothers; Jack and Ellenor Buell; PotlatchDeltic Land and Lumber, LLC; PotlatchDeltic Forest Holdings, Inc.; and Potlatch TRS Idaho, LLC. The parties respectfully request either an expedited hearing or an expedited order from the Court in order to avoid falling out of compliance with the current schedule.

MOTION TO ADOPT STIPULATION TO AMEND SCHEDULE Page 1 of 5

The schedule agreed to among the parties seeks to preserve the dispositive motion deadline and trial date while providing sufficient time for exchange of expert reports, depositions, and discovery. The schedule also proposes an accommodation for the United States to obtain a substitute witness because one of its experts, Dr. Mazeika Sullivan, has become very ill and can no longer serve as an expert. The United States has obtained a replacement witness but requires additional time to produce the expert reports related to the two categories of claims that include work involving Dr. Sullivan: 1) Lake Claim; and 2) Amended Riparian Claims (21 total) (together "Substitute Expert Claims"). Given these unique circumstances the Tribe has also informed the United States that it is also deciding whether to bring on an expert for the Substitute Expert Claims subject to the stipulated schedule below.

Stipulated Proposed Schedule

May 31, 2024:	Disclosure of Claimants' expert reports for all claims other than Substitute Expert Claims
June 14, 2024:	Deadline to file Objections to Amended Claims
July 19, 2024:	Deadline to file Responses to Objections to Amended Claims
Sept. 13, 2024:	Disclosure of Claimants' expert reports for Substitute Expert Claims
Dec. 18, 2024:	Disclosure of Objectors' expert reports for all claims other than Substitute Expert Claims
Feb 13, 2025:	Disclosure of Objectors' expert reports for Substitute Expert Claims.
March 21, 2025:	Disclosure of Claimants' rebuttal reports for all claims other than Substitute Expert
May 16, 2025:	Disclosure of Claimants' rebuttal reports for Substitute Expert Claims.
Aug. 1, 2025:	Discovery closes
Sept. 17, 2025:	Deadline to file dispositive motions
Feb. 19, 2026:	Status conference
March 2, 2026:	Deadline to exchange witness and exhibit lists
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MOTION TO ADOPT STIPULATION TO AMEND SCHEDULE Page 2 of 5

March 19, 2026:

Pretrial conf

April 2026:

Trial

The United States and Tribe have also agreed to supplement discovery and the expert reports will be accompanied by supplemental discovery disclosures.

DATED this 9th day of May 2024.

Respectfully submitted, Todd Kim Assistant Attorney General

Vanessa Boyd Willard Katherine M. Kane

Trial Attorneys, Indian Resources Section Environment & Natural Resources Division

Janua Boy Wolland

United States Department of Justice

CERTIFICATE OF SERVICE

I certify that an original copy of the documents listed above was sent via Fax on this 9th day of May 2024.

Clerk of the District Court, Twin Falls County Coeur d' Alene-Spokane River Basin Adjudication 253 Third Avenue North Twin Falls, ID 83303

I certify that an original copy of the documents listed above was sent via FedEx on this 9th day of May 2024.

Clerk of the District Court, Twin Falls County Coeur d'Alene-Spokane River Basin Adjudication 253 Third Avenue North Twin Falls, ID 83303 Director of IDWR 322 East Front Street Boise, ID 83702

I certify that true and correct copies of the documents listed above were sent via electronic mail and/or U.S. Post to the parties below on this 9th day of May 2024.

STATE OF IDAHO
Chief Natural Resources Division
Office of the Attorney General
PO BOX 83720
Boise, ID 83720-0010
Scott.Campbell@ag.idaho.gov
joy.vega@ag.idaho.gov
David.Perkins@ag.idaho.gov

AVISTA CORPORATION
CITY OF COEUR D'ALENE
Chris Bromley
380 S. 4th St. Ste 103
Boise, ID 83702
cbromley@mchughbromley.com

HECLA LIMITED
Albert P. Barker
1010 W. Jefferson St. Ste 102
Boise, ID 83701
abarker@martenlaw.com

COEUR D'ALENE TRIBE Vanessa L. Ray-Hodge 500 Marquette Ave NW Ste 660 Albuquerque, NM 87102 vrayhodge@abqsonosky.com

Eric Van Orden 850 A Street Plummer, ID 83851 eric.vanorden@cdatribe-nsn.gov

NORTH IDAHO WATER RIGHTS
GROUP
Norman M. Semanko
Parsons Behle & Latimer
800 W. Main Street, Ste 1300
Boise, ID 83702
NSemanko@parsonsbehle.com

CITY OF COEUR D'ALENE
Candice M. McHugh
380 S. 4th St. Ste 103
Boise, ID 83702
cmchugh@mchughbromley.com

MOTION TO ADOPT STIPULATION TO AMEND SCHEDULE Page 4 of 5

POTLATCHDELTIC LAND AND LUMBER, LLC POTLATCHDELTIC FOREST HOLDINGS, INC. POTLATCH TRS IDAHO, LLC Michael P. Lawrence 601 W. Bannock St. Boise, ID 83701 mpl@givenspursley.com

U.S. Department of Justice Environment & Natural Resources Division 550 W. Front St., MSC 033 Boise, ID 83724 matsmith@caci.com BENEWAH COUNTY, CITIES OF ST.
MARIES AND HARRISON; BUELL
BROTHERS; JACK AND ELLENOR
BUELL
Mariah R. Dunham
722 Main Ave.
St. Maries, ID 83861
mdunham@dunhamwolff.net

Vanessa Boyd Willard

(brun Box Collage)