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19 Mokelumne River Water and Power Authority

20 [ADDITIONAL COUNSEL LISTED ON FOLLOWING PAGE]

21 **BEFORE THE**
22 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

23 HEARING IN THE MATTER OF
24 CALIFORNIA DEPARTMENT OF WATER
25 RESOURCES AND UNITED STATES
26 BUREAU OF RECLAMATION
27 REQUEST FOR A CHANGE IN POINT OF
28 DIVERSION FOR CALIFORNIA WATER
FIX

**MOTION FOR EXTENSION OF TIME
TO ALLOW WITNESS TESTIMONY OF
ROGER B. MOORE IN LIGHT OF
EXIGENT CIRCUMSTANCES**

(Part 2 Case in Chief)

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Attorneys for California Sportfishing Protection Alliance,
California Water Impact Network, and AquAlliance

1 The above-captioned parties hereby petition the State Water Resources Control Board
2 (“SWRCB”) to grant an emergency extension of time for filing the testimony and associated
3 exhibits of Roger B. Moore, which would otherwise be due to be filed and served on or before
4 noon on November 30, 2017. Mr. Moore learned yesterday of the death of his wife’s father, a
5 circumstance that produced an unexpected and immediate need for him then and for the next
6 several days to attend to time-sensitive matters for his wife and children and their family. Due to
7 these exigent circumstances, these parties, which have designated Mr. Moore as a witness,
8 request an extension of time and propose a due date of noon on December 7, 2017 to file Mr.
9 Moore’s written testimony and exhibits.

10 We appreciate the Hearing Officers’ consideration of this motion, and expect it should
11 not unduly prejudice other parties in view of the expected time period still remaining before the
12 hearing officers will hear cases in chief. This request pertains only to the written testimony and
13 exhibits of Mr. Moore, and not that of other witnesses. We, and Mr. Moore, are aware that
14 granting this request would not provide an opportunity for this written testimony to rebut
15 testimony submitted by other parties for their Part 2 cases in chief.

16
17 Respectfully submitted,

18 Dated: November 30, 2017

FREEMAN FIRM, A PLC

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20 By: 

21 THOMAS H. KEELING
22 Attorney for Public Agencies
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