

Dale M. Foreman, WSBA #6507      The Honorable Rosanna M. Peterson  
Tyler D. Hotchkiss, WSBA #40604  
Foreman, Hotchkiss, Bauscher & Zimmerman, PLLC  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

PAUL GRONDAL, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA; et  
al.,

Defendants.

**Case No. 2:09-cv-0018-RMP**

**MOTION FOR EXPEDITED  
HEARING ON MOTION TO  
EXTEND DEADLINE RE: ECF  
NO. 411**

Noted: Immediately (or as soon as  
possible at the Court’s discretion)  
Without Oral Argument

Pursuant to LCR 7(i)(2)(C), Defendant, Wapato Heritage, LLC and  
Plaintiffs (collectively, the “Moving Parties”) request expedited hearing of  
their Motion to Extend Deadline Re: ECF No. 411 (“Motion to Extend”),  
which is being filed contemporaneously with this motion. Wapato Heritage  
respectfully requests that the Motion to Extend be noted immediately or as  
soon as is possible at the Court’s discretion.

MOTION FOR EXPEDITED HEARING  
ON MOTION TO EXTEND DEADLINE  
RE: ECF NO. 411 - 1

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3 Under the Court’s Order setting the briefing schedule for the issue of  
4 representation of individual Defendants, the deadline to provide supplemental  
5 briefing is April, 9, 2020 (the “Deadline”). ECF No. 411.  
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8 In the Motion to Extend, the Moving Parties have moved for a thirty (30)  
9 day extension to the Deadline. The opposing parties confirmed their positions  
10 on Wapato Heritage’s and Plaintiffs’ request in the Motion to Extend on April  
11 1, 2020 and Wapato Heritage and Plaintiffs have filed the Motion to Extend as  
12 soon as possible thereafter. However, under the local rules, the Joint Motion to  
13 Extend is noted for hearing thirty days after filing—May 1, 2020, well after the  
14 Deadline. *See* LCR 7(i)(2)(A). To provide timely relief Wapato Heritage and  
15 Plaintiffs respectfully request that their Motion to Extend be heard immediately  
16 or as soon as possible at the Court’s discretion per LCR 7(i)(2)(C).  
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20 DATED this 1<sup>st</sup> day of April, 2020.

21  
22 **FOREMAN, HOTCHKISS, BAUSCHER & ZIMMERMAN, PLLC**

23 /s/ Tyler D. Hotchkiss  
24 Dale M. Foreman, WSBA # 6507  
25 Tyler D. Hotchkiss, WSBA # 40604  
26 P. O. Box 3125

27 MOTION FOR EXPEDITED HEARING  
28 ON MOTION TO EXTEND DEADLINE  
29 RE: ECF NO. 411 - 2  
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MOTION FOR EXPEDITED HEARING  
ON MOTION TO EXTEND DEADLINE  
RE: ECF NO. 411 - 3

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below, I caused the foregoing document, to be electronically filed with the Clerk of the above entitled Court using the CM/ECF system, which will send notification of such filing to the following:

- Franklin L. Smith: [frank@flyonsmith.com](mailto:frank@flyonsmith.com)
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and hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

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MOTION FOR EXPEDITED HEARING  
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MOTION FOR EXPEDITED HEARING  
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DATED this 1<sup>st</sup> day of April, 2020.

/s/ Tyler D. Hotchkiss  
Tyler D. Hotchkiss, WSBA #40604

MOTION FOR EXPEDITED HEARING  
ON MOTION TO EXTEND DEADLINE  
RE: ECF NO. 411 - 6

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