

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
Civil Division**

THE CALIFORNIA VALLEY MIWOK  
TRIBE, *et al.*,

Plaintiffs,

v.

KEN SALAZAR, in his official capacity as  
Secretary of the United States Department of  
the Interior, *et al.*,

Defendants.

Case No. 1:11-cv-00160-RWR

Hon. Richard W. Roberts

**JOINT MOTION FOR BRIEFING SCHEDULE  
FOR CROSS MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs and defendants hereby jointly move for an order which enters the briefing schedule for cross motions for summary judgment set forth below. In this case the plaintiffs challenge the August 31, 2011 final decision of the Assistant Secretary – Indian Affairs for the U.S. Department of Interior. On September 20, 2011, the Court entered an order which, *inter alia*, required plaintiffs to file an amended complaint by October 17, 2011, and defendants, no later than December 1, 2011, to answer or otherwise respond to the amended complaint and to lodge the administrative record.

Pursuant to the September 20, 2011 order, plaintiffs, on October 17, 2011, filed their First Amended Complaint, and defendants, on December 1, 2011, filed their Answer to the First Amended Complaint and the administrative record for this case. The parties believe that the case should be resolved on cross-motions for summary judgment, and propose the following briefing schedule:

**Pleading**

**Deadline**

Plaintiffs' Motion For Summary Judgment

February 21, 2012

Defendants' Combined Opposition To Plaintiffs'  
Motion For Summary Judgment And Cross Motion  
For Summary Judgment

March 20, 2012

Plaintiffs' Combined Reply In Support Of Plaintiffs' April 17, 2012  
Motion For Summary Judgment And Opposition To  
Defendants' Cross-Motion For Summary Judgment

Defendants' Reply In Support Of Defendants' Cross May 8, 2012  
Motion For Summary Judgment

A proposed order setting forth these dates is enclosed.

**CONCLUSION**

For the reasons set forth above, the parties respectfully request that the Court enter the briefing schedule requested herein.

Respectfully submitted this 28th day of December, 2011.

Respectfully submitted,

/s/ M. Roy Goldberg

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**CERTIFICATE OF SERVICE**

I certify that on December 28th, 2011, I caused the foregoing "Joint Motion for Briefing Schedule for Cross Motions for Summary Judgment" to be filed with the Court pursuant to the electronic filing rules. All participants are registered CM/ECF users, and will be served by the CM/ECF system.

/s/ Roy Goldberg  
Roy Goldberg