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Attorney for Plaintiffs  
CALIFORNIA VALLEY MIWOK TRIBE,  
THE GENERAL COUNCIL, SILVIA BURLEY,  
RASHEL REZNOR, ANJELICA PAULK and  
TRISTIAN WALLACE

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

**CALIFORNIA VALLEY MIWOK TRIBE, a** ) Case No.: 2:16-cv-01345-WBS-CKD  
federally-recognized Indian )  
tribe, **THE GENERAL COUNCIL,** ) **NOTICE OF HEARING FOR AN**  
**SILVIA BURLEY, RASHEL REZNOR;** ) **ORDER STAYING ASSISTANT**  
**ANJELICA PAULK; and TRISTIAN** ) **SECRETARY-INDIAN AFFAIRS'**  
**WALLACE** ) **DECEMBER 30, 2015 DECISION**

Plaintiffs,

vs.

**SALLY JEWEL, in her official** ) Date: August 8, 2016  
capacity as U.S. Secretary of ) Time: 1:30 p.m.  
Interior; **LAWRENCE S. ROBERTS, in** ) Judge: William B. Shubb  
his official capacity as Acting )  
Assistant Secretary of Interior - )  
Indian Affairs; **MICHAEL BLACK, in** )  
his official capacity as Director )  
of the Bureau of Indian Affairs. )

Defendants.

TO EACH PARTY AND TO COUNSEL OF RECORD FOR EACH PARTY:

**PLEASE TAKE NOTICE** that on August 8, 2016, at 1:30 p.m. in  
Courtroom 5, 14<sup>th</sup> Floor of the above-entitled court, located at  
501 "I" Street, Sacramento, CA 95814, Plaintiffs will, and

1 hereby do, move this court for an order staying AS-IA's December  
2 2015 Decision, on the following grounds:

3 1. Plaintiffs filed suit on June 17, 2016 challenging the  
4 Washburn decision as arbitrary and capricious, or otherwise  
5 unlawful. The decision is a final agency action and allows the  
6 competing tribal faction to submit documentation to support its  
7 own constitution for purposes or "reorganizing" the Tribe. The  
8 BIA has recently sought to implement the Washburn decision by  
9 notifying Plaintiffs that the competing tribal faction has in  
10 fact submitted documentation to support its own constitution,  
11 and further notifying Plaintiffs that it intends to act on the  
12 submission by July 12, 2016. (See Ex. "1," BIA letter to Silvia  
13 Burley).

14 2. Plaintiffs requested in their complaint an immediate  
15 stay of the Washburn decision pending resolution of their suit  
16 in federal court.

17 This motion will be based on this notice, the attached  
18 Memorandum of Points and Authorities, the attached declaration  
19 of Manuel Corrales, Jr., the complete files and records of this  
20 action, and such oral and documentary evidence as may be  
21 presented at the hearing.

22 Dated: July 8, 2016



23 Manuel Corrales, Jr., Esq.  
24 Attorney for Plaintiffs  
25 CALIFORNIA VALLEY MIWOK  
26 TRIBE, THE GENERAL COUNCIL,  
27 SILVIA BURLEY, RASHEL REZNOR,  
28 ANJELICA PAULK and TRISTIAN  
WALLACE