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Manuel Corrales, Jr., Esq. SBN 117647 1 ATTORNEY AT LAW 17140 Bernardo Center Drive, Suite 358 San Diego, California 92128 Tel: (858) 521-0634 3 Fax: (858) 521-0633 Email: mannycorrales@yahoo.com 4 5 Attorney for Plaintiffs CALIFORNIA VALLEY MIWOK TRIBE, 6 THE GENERAL COUNCIL, SILVIA BURLEY, RASHEL REZNOR, ANJELICA PAULK and 7 TRISTIAN WALLACE 8 9 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA 10 11 CALIFORNIA VALLEY MIWOK TRIBE, a) Case No.: 2:16-cv-01345-WBS-CKD federally-recognized Indian 12) AMENDED NOTICE OF HEARING FOR tribe, THE GENERAL COUNCIL, AN ORDER STAYING ASSISTANT SILVIA BURLEY, RASHEL REZNOR; 13 SECRETARY-INDIAN AFFAIRS' ANJELICA PAULK; and TRISTIAN DECEMBER 30, 2015 DECISION 14 WALLACE 1.5 Plaintiffs, 16 VS.) Date: September 6, 2016 17) Time: 1:30 p.m. SALLY JEWEL, in her official) Judge: William B. Shubb 18 capacity as U.S. Secretary of Interior; LAWRENCE S. ROBERTS, in 19 his official capacity as Acting Assistant Secretary of Interior -20 Indian Affairs; MICHAEL BLACK, in) 21 his official capacity as Director) of the Bureau of Indian Affairs. 22 23 Defendants. 24 TO EACH PARTY AND TO COUNSEL OF RECORD FOR EACH PARTY: 25 PLEASE TAKE NOTICE that on September 6, 2016, at 1:30 p.m. 26 in Courtroom 5, 14th Floor of the above-entitled court, located 27 at 501 "I" Street, Sacramento, CA 95814, Plaintiffs will, and

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

- 1. Plaintiffs filed suit on June 17, 2016 challenging the Washburn decision as arbitrary and capricious, or otherwise unlawful. The decision is a final agency action and allows the competing tribal faction to submit documentation to support its own constitution for purposes or "reorganizing" the Tribe. The BIA has recently sought to implement the Washburn decision by notifying Plaintiffs that the competing tribal faction has in fact submitted documentation to support its own constitution, and further notifying Plaintiffs that it intends to act on the submission by July 12, 2016. (See Ex. "1," BIA letter to Silvia Burley).
- 2. Plaintiffs requested in their complaint an immediate stay of the Washburn decision pending resolution of their suit in federal court.

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

Dated: July 21, 2016

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