

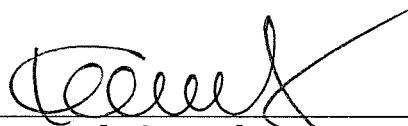
1 hereby do, move this court for an order staying AS-IA's December
2 2015 Decision, on the following grounds:

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 21, 2016



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CALIFORNIA VALLEY MIWOK
TRIBE, THE GENERAL COUNCIL,
SILVIA BURLEY, RASHEL REZNOR,
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