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8 Attorney for Protestants Save the California Delta Alliance, et al.

9 **BEFORE THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

10 **IN RE CALIFORNIA WATERFIX**  
11 **CALIFORNIA DEPARTMENT OF**  
12 **WATER RESOURCES AND U.S.**  
13 **BUREAU OF RECLAMATION**  
14 **PETITION FOR CHANGES IN**  
15 **WATER RIGHTS, POINTS OF**  
16 **DIVERSION/RE-DIVERSION**

17 **PROTESTANT SAVE THE CALIFORNIA**  
18 **DELTA ALLIANCE, ET AL.'s JOINDER IN**  
19 **PROTESTANTS CENTRAL DELTA WATER**  
20 **AGENCY ET AL.'s REQUEST FOR AN**  
21 **EXTENSION OF TIME TO SUBMIT**  
22 **PROTESTANTS' EXHIBITS AND WRITTEN**  
23 **SUMMARIES OF TESTIMONY FOR PART 1B**  
24 **OF THE CALIFORNIA WATER FIX**  
25 **CHANGE PETITION**

1 Protestants Save the California Delta Alliance, et al., hereby join in Central Delta Water  
2 Agency, et al.'s request for an extension of time for protestants to submit their cases in chief for part  
3 1B of the hearings.

4 Delta Alliance respectfully requests that in considering this request for an extension, the  
5 Board take note that Delta Alliance and numerous other protestants in these proceedings are small  
6 organization with limited resources. It goes without saying that these proceedings present  
7 enormously complicated issues and the inherent difficulty presented in preparing for these  
8 proceedings has been highlighted by the direct testimony and cross-examination thus far.

9 The state and federal governments found it necessary to request two extensions of time to  
10 submit their cases in chief despite the fact that they had complete control over when the Petition  
11 was submitted. Delta Alliance believes that the need of the project operators to request extensions  
12 of time shows that there is great complexity in preparing and that granting an extension of time to  
13 Protestants with far less resources than Petitioners would be reasonable and fair.

14 Delta Alliance believes that this request can be granted without any prejudice to Petitioners.  
15 The due date for Petitioners' written objections to Protestants' evidence submitted with their cases  
16 in chief currently is set for September 15, 2016 (2 weeks after submission of the cases in chief).  
17 However, the Board elected not to rule on written objections submitted by Protestants until the  
18 conclusion of Part 1A. Delta Alliance expects the same would be true for Petitioners' objections as  
19 to Protestants' evidence, i.e., the Board would not rule until the conclusion of Part 1B. Therefore,  
20 moving the deadline for submission of objections to evidence to two weeks after the extended  
21 deadline for submission of Protestants' cases in chief would not impact the scheduled start of Part 1  
22 B hearings on October 20, 2016.

23 Should it be necessary to delay the start of Part 1B hearings, Delta Alliance notes that all  
24 hearing dates were suspended in the face of Petitioners' request for an extension and the hearings  
25 were ultimately pushed back to accommodate Petitioners' extension. Although it may not be needed  
26 to accommodate the requested extension for submission of written materials, it would only be fair to  
27 extend the hearing dates in the same manner as was done to accommodate Petitioners if that is  
28 necessary to preserve adequate time frames.

1 Delta Alliance therefore respectfully urges the Board to **GRANT** an extension of time for  
2 submission of protestants' cases in chief for Part 1B until 30 days after conclusion of Part 1A.

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4  
5 Respectfully submitted,

Dated: August 11, 2016

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7 Michael A. Brodsky  
8 Attorney for Protestants  
9 Save the California Delta Alliance, et al.  
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**STATEMENT OF SERVICE**

**CALIFORNIA WATERFIX PETITION HEARING  
Department of Water Resources and U.S. Bureau of Reclamation (Petitioners)**

I hereby certify that I have this day submitted to the State Water Resources Control Board and caused a true and correct copy of the following document(s):

**PROTESTANT SAVE THE CALIFORNIA DELTA ALLIANCE, ET AL.'s JOINDER IN PROTESTANTS CENTRAL DELTA WATER AGENCY ET AL.'s REQUEST FOR AN EXTENSION OF TIME TO SUBMIT PROTESTANTS' EXHIBITS AND WRITTEN SUMMARIES OF TESTIMONY FOR PART 1B OF THE CALIFORNIA WATER FIX CHANGE PETITION**

to be served **by Electronic Mail** (email) upon the parties listed in Table 1 of the **Current Service List** for the California WaterFix Petition Hearing, dated July 25, 2016, posted by the State Water Resources Control Board at [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/service\\_list.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)

I certify that the foregoing is true and correct and that this document was executed on August 12, 2016.

Signature: \_\_\_\_\_

Name: Michael A. Brodsky

Title: Attorney

Party/Affiliation:

Save the California Delta Alliance, et al.

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