KARIN J. IMMERGUT, OSB #96314 United States Attorney STEPHEN J. ODELL, OSB #90353 Assistant United States Attorney District of Oregon 600 United States Courthouse 1000 S.W. Third Avenue Portland, OR 97204-2902 (503) 727-1000

SUE ELLEN WOOLDRIDGE
Assistant Attorney General
SETH M. BARSKY, Assistant Chief
ROBERT L. GULLEY, Senior Trial Attorney
(202) 305-0500 (ph)
(202) 305-0275 (fx)
COBY HOWELL, Trial Attorney
(503) 727-1023 (ph)
Wildlife & Marine Resources Section
Benjamin Franklin Station, P.O. Box 7369
Washington, DC 20044-7369

Attorneys for Defendants

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

NATIONAL WILDLIFE FEDERATION, et al.	
Plaintiffs,	Civil No. 01-640-RE
v.	FEDERAL DEFENDANTS'
NATIONAL MARINE FISHERIES SERVICE, et al.	UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FIFTH STATUS REPORT
Defendants.	

Federal Defendants respectfully move the Court for an extension of time to file Federal

FED. DEFS' MOT. EXTENSION OF TIME

Defendants' Fifth Status Report on the Federal Colombia River Power System ("FCRPS")

remand for the following reasons. As currently scheduled, Federal Defendants are required to

file the next status report on January 3, 2007. Because the status report is a collaborative product

necessitating a number of discussions within the Policy Work Group ("PWG") and because this

report falls right after the holidays, Federal Defendants and members of the PWG believe that a

one-month extension would allow for the preparation of a more comprehensive and accurate

product. Further, in light of current discussions on the possible filing of a motion for preliminary

injunctive relief for 2007 FCRPS operations, the collaborating parties have not focused their

attention on this status report. Finally, Federal Defendants have consulted with all of the parties

and there is no opposition to this request for an extension of time.

In light of these concerns and the lack of opposition, Federal Defendants ask for an

extension of time until February 2, 2007, to file the next status report.

Dated: December 7, 2006

Respectfully Submitted,

SUE ELLEN WOOLDRIDGE

Assistant Attorney General

SETH M. BARSKY

Assistant Chief ROBERT L. GULLEY,

Senior Trial Attorney

(202) 305-0500 (ph)

s/ Coby Howell

COBY HOWELL, Trial Attorney

(503) 727-1023 (ph)

Wildlife & Marine Resources Section

Benjamin Franklin Station, P.O. Box 7369

Washington, DC 20044-7369

FED. DEFS' MOT. **EXTENSION OF TIME**

1

Attorneys for Defendants

CERTIFICATE OF SERVICE

Pursuant to Local Rule Civil 100.13(c) and Fed. R. Civ. P. 5(d), I certify that on December 7, 2006, the foregoing will be electronically filed with the Court's electronic filing system, which will generate automatic service upon all Parties enrolled to receive such notice. The following will be manually served by first class U.S. mail, as noted:

Walter H. Evans, III Schwabe Williamson Wyatt, P.C. 1211 S.W. Fifth Ave 1600-1800 Pacwest Center Portland, Oregon 97204 (wevans@schwabe.com)

James W. Givens 1026 F Street P.O. Box 875 Lewiston, ID 83051

/s/ Coby Howell	
-----------------	--