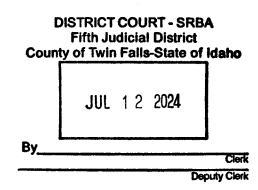
Page 003

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Facsimile: 208-388-1300 mpl@givenspursley.com csb@givenspurslev.com 18354916.1 [16631-1]



Counsel for Moonshine Ventures, LLC

## IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT FOR THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA SUBCASES 69-4103A, 69-4103B, 69-

Case No. 39576

THIRD STIPULATED MOTION TO EXTEND DEADLINE TO RESPOND TO MOTION TO ENFORCE SETTLEMENT AGREEMENT

4104A, 69-4104B and 69-4122

COME NOW Respondents Moonshine Ventures, LLC ("Moonshine Ventures") and Jack Rubelt and Ava R. Rubelt ("Rubelt"), and Movant Crooked River Ranches, LLC ("CRR"), and pursuant to Administrative Order 1 ("A.O.I."), hereby stipulate and jointly move the Court to extend the deadline for Moonshine Ventures and Rubelt to respond to CRR's Motion to Enforce Settlement Agreement ("Motion") from July 12, 2024 to August 13, 2024 as follows:

- 1. CRR filed a Motion to Enforce Settlement Agreement ("Motion") with this Court on March 25, 2024. On May 10, 2024 this Court issued an Order of Reference Appointing Theodore R. Booth as Special Master ("Order") to preside over the above-captioned matter.
- 2. On May 14, 2024 the parties filed a Stipulated Motion to Extend Deadline to respond to Motion to Enforce Settlement Agreement ("First Stipulated Motion"), which was granted by the Court.

- 4. On June 12, 2024, the parties filed a Second Stipulated Motion to Extend

  Deadline to respond to Motion to Enforce Settlement Agreement ("Second Stipulated Motion")

  extending Moonshine and Rubelt's response deadline to July 12, 2024, which was granted by the

  Court.
- 5. Moonshine Ventures, Rubelt, and CRR have been engaged in settlement discussions to resolve the issues raised in the *Motion* and the parties believe that it will be judicially efficient and in the economic interests of the parties to further extend the deadline for Moonshine Ventures and Rubelt to respond to the *Motion* in order to continue settlement negotiations. The parties believe that they are close to settlement.

Accordingly, Moonshine Ventures, Rubelt, and CRR respectfully request that the Court issue an order extending the deadline by which Moonshine Ventures and Rubelt must respond to the *Motion* from July 12, 2024, to August 13, 2024. Additionally, the parties respectfully request that the Court hold the status conference currently scheduled for July 23, 2024 in the above-captioned matter rather than rescheduling it in light of the requested extension.

DATED July 12, 2024.

GIVENS PURSLEY LLP

By /s/ Charlie S. Baser

Michel P. Lawrence
Charlie S. Baser
Attorneys for Moonshine Ventures, LLC

## MORROW & FISCHER PLLC

By <u>/s/ Julie Klein Fischer</u>
Julie Klein Fischer
Attorney for Jack Rubelt and Ava R. Rubelt

## MCHUGH BROMLEY, PLLC

By /s/ Chris M. Bromley
Chris M. Bromley
Attorney for Crooked River Ranches, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 12, 2024, the foregoing was filed, served, and copied as set out below.

DOCUMENT FILE	ED:	
Clerk of the SRBA Court 253 Third Avenue North Twin Falls, ID 83301		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
SERVICE COPIES TO:		
IDWR Document Depository PO Box 83720 Boise, ID 83720-0098		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
Chief, Natural Resources Division Office of the Attorney General State of Idaho PO Box 83720 Boise, ID 83720-0098		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
Julie Klein Fischer Morrow & Fischer PLLC 4 Ogden Ave. Nampa, ID 83651 Attorney for Jack Rubelt and Ava R. Rubelt		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
Chris M. Bromley Candice McHugh McHugh Bromley, PLLC 380 S. 4th St., Ste. 103 Boise, ID 83702 Attorney for Crooked River Ranches, LLC		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
The United States Department of Justice, Environment and Natural Resources Division 550 West Fort Street, MSC 033 Boise, ID 83724		U. S. Mail Hand Delivered Overnight Mail Facsimile E-mail
/s/ (	Charlie S. Bases	м

Charlie S. Baser