

Michael P. Lawrence, ISB #7288
Charlie S. Baser, ISB #10884
GIVENS PURSLEY LLP
601 W Bannock St
PO Box 2720
Boise, Idaho 83702
Telephone: 208-388-1294
Facsimile: 208-388-1300
mpl@givenspursley.com
csb@givenspursley.com
18354916.1 [16631-1]

DISTRICT COURT - SRBA
Fifth Judicial District
County of Twin Falls-State of Idaho

JUL 12 2024

By _____ Clerk
Deputy Clerk

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, 69-4104A, 69-4104B and 69-4122

Case No. 39576

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

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.

3. On May 28, 2024 the Court held a status conference in the above-captioned matter, at which the parties requested and Special Master Booth approved an extension of Moonshine Ventures' and Rubelt's response deadline to June 12, 2024.

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 /s/ Julie Klein Fischer

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 FILED:

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. Baser
Charlie S. Baser