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9 Counsel for Interested Party
10 KLAMATH RIVERKEEPER

11
12 BEFORE THE STATE WATER RESOURCES CONTROL BOARD
13 STATE OF CALIFORNIA

14 In the Matter of:) KARUK TRIBE'S AND KLAMATH
DOUGLAS AND HEIDI COLE AND) RIVERKEEPER'S MOTION TO FILE
15 MARBLE MOUNTAIN RANCH) JOINT BRIEF
_____)

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18 Interested parties Karuk Tribe and Klamath Riverkeeper submit this motion to file a joint
19 closing brief in the Matter of Douglas and Heidi Cole and Marble Mountain Ranch. If granted,
20 this request would result in a supplementation to the November 27, 2017 Ruling Regarding
21 Closing Briefs, which set a page limit of 25 pages for closing briefs but did not address the
22 issue of whether joint closing briefs would be permitted. The Karuk Tribe and Klamath
23 Riverkeeper contacted the hearing team to determine whether it is necessary to make a
24 motion to file a joint brief and, if so, what standard would need to be met to have such a
25 request granted. The Karuk Tribe and Klamath Riverkeeper were informed that they should file
26 a motion and that a motion would be granted upon a showing of good cause. The required
27 good cause is provided below.

28 First, the Karuk Tribe's and Klamath Riverkeeper's interests are sufficiently aligned such

1 that submitting a joint brief will avoid redundancy and repetition that would otherwise result
2 with the filing of two separate briefs. Avoiding redundancy and repetition would benefit the
3 hearing team as it will result in fewer resources expended to evaluate the arguments. Second,
4 the Karuk Tribe and Klamath Riverkeeper are not requesting permission to file a brief longer
5 than 25 pages, thus allowing a joint brief will not result in a brief that exceeds the length
6 already authorized by the State Water Board.

7 In addition, the Karuk Tribe and Klamath Riverkeeper contacted counsel for Douglas
8 and Heidi Cole and Marble Mountain Ranch to determine if they would oppose this motion.
9 Counsel for the Coles and Marble Mountain Ranch indicated they do not oppose this motion
10 provided that the Karuk Tribe and Klamath Riverkeeper are not seeking to expand the 25 page
11 limit through filing a joint brief. As explained above, the Karuk Tribe and Klamath Riverkeeper
12 are not requesting an expansion of the 25 page limit for closing briefs in this matter.

13 Therefore, the Karuk Tribe and Klamath Riverkeeper respectfully request permission to
14 file a joint closing brief in this matter.

15 Date: March 22, 2018

Respectfully submitted,

16 /s/ Drevet Hunt
17 Drevet Hunt
18 Lawyers for Clean Water, Inc.
19 Attorney for Karuk Tribe

20 /s/ Paul S. Kibel
21 Paul S. Kibel
22 Water and Power Law Group
23 Attorney for Klamath Riverkeeper
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1 **Proof of Service**

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3 I served and true and correct copy of KARUK TRIBE'S AND KLAMATH
4 RIVERKEEPER'S MOTION TO FILE JOINT BRIEF on the parties to this matter by electronic
5 mail sent from my email drev@lawyersforcleanwater.com on Thursday March 22, 2018 to the
6 following recipients.

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