

1. On June 18, 2020, the Board issued an Order Denying Motion for Reconsideration and Granting Petitioner Leave to Supplement Petition for Review, with Limitations (Dkt. No. 18). The Order granted San Francisco leave to supplement its Petition for Review and set the following briefing schedule and requirements:

San Francisco's supplement to its petition, if any, may be no more than 10,000 words and must be filed no later than June 30, 2020. The Region's response to San Francisco's supplemental petition, if any, may be no more than 10,000 words and must be filed no later than July 13, 2020. San Francisco may file a reply of no more than 5,000 words no later than July 20, 2020.

Dkt. No. 18 at 6-7.

2. As soon as reasonably possible, San Francisco informed the Region that its outside counsel, Hunton Andrews Kurth LLP, will no longer be representing San Francisco in this appeal beginning July 1, 2020.
3. Good cause exists for an extension of time to provide new counsel time to review the voluminous administrative record, file San Francisco's reply to the Supplement, and prepare for oral argument.
4. Given the circumstances, the change of San Francisco's outside counsel will inevitably make efforts to file its reply brief to the Supplement – including coordinating and transferring files, reviewing the administrative record and docket, drafting, and finalization – more cumbersome and time-consuming. The additional time will provide necessary time to ensure that San Francisco is represented by competent outside counsel and able to submit an adequate reply brief to the Board.
5. The jointly requested extensions are equitable because they provide both the Region, and San Francisco, with an equal twenty days to prepare and submit briefs. The combined extension to the schedule will provide adequate time for San Francisco to file its reply in light of the inevitable consequences resulting from San Francisco's

change in outside counsel due to circumstances beyond its control.

6. In consideration of San Francisco's need to extend the deadline of its reply brief, and in order to provide an equitable extension to the briefing deadlines for both parties, a 10-day extension should also be granted for both the Region's response brief and San Francisco's reply brief, respectively.
7. The Parties stipulate and agree to the proposed briefing schedule set forth below:
 - The deadline for the Region's response to the Supplement, which would otherwise be July 13, 2020, shall be extended by ten days to July 23, 2020.
 - The deadline for San Francisco's reply to the Supplement shall be extended by an equal amount of time to August 12, 2020.
8. On June 26, 2020, the Clerk of the Board notified the Parties by email that Oral Argument for this matter is scheduled for Tuesday, August 18, 2020 at 1:00pm EST.
9. On June 29, 2020, the Clerk of the Board notified the Parties by email that each party should designate the names of individuals who will present oral argument in this matter. For the reasons state herein, the Parties stipulate that (i) San Francisco shall provide the Board with the name of counsel presenting argument on August 3, 2020, or otherwise update the Board about the status of retaining outside counsel to present oral argument at that time, and (ii) the Region shall provide the Board with the name of counsel presenting oral argument by August 3, 2020.
10. For the reasons stated herein, including San Francisco's change of counsel, and the requested briefing schedule extension, the Parties request that Oral Argument for this matter be rescheduled to September 2020, or later, at a date and time acceptable to the Board.

For the reasons described above, the Parties respectfully request that the Board grant this Joint Motion for Extension of Time and (i) extend the deadlines for San Francisco and the Region's briefs, (ii) reschedule Oral Argument for a date in September 2020, or later, and (iii) allow the Parties to designate counsel for oral argument, or for San Francisco to provide an update on the retention of outside counsel, on August 3, 2020.

June 30, 2020

Respectfully submitted,

Attorneys for San Francisco

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2020, a true and correct copy of the foregoing Joint Motion for Extension of Time was filed electronically using the EAB eFiling system.

/s/ J. Tom Boer _____

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