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4 UNITED STATES DISTRICT COURT

5 NORTHERN DISTRICT OF CALIFORNIA-EUREKA DIVISION

6 CRYSTAL BOWMAN,

Case No.: 5:25-cv-06372-BLF

7 Plaintiff,

8 vs.

MOTION FOR LEAVE TO FILE SUR-REPLY

9 JOSEFINA FRANK ET AL,

10 Defendant

11 Plaintiff respectfully moves for leave to file a short sur-reply limited to addressing new arguments and factual  
12 assertions raised for the first time in Defendants' Reply (Doc. 23).

13  
14 In their Reply, Defendants introduce new factual assertions and expanded legal arguments concerning:

- 15 1. The reassignment of the residence at 81 Carroll Road;
- 16 2. The comparative severity analysis under Tavares v. Whitehouse;
- 17 3. The scope and effects of Plaintiff's exclusion, including its application to all Bear River tribal properties;
- 18 4. Statements regarding publication and service not previously presented in the Motion to Dismiss.

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20 These matters materially expand upon the grounds raised in Defendants' original Motion to Dismiss. Because they  
21 were raised for the first time in the Reply, Plaintiff has not had an opportunity to address them.  
22

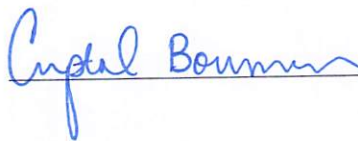
1 The proposed sur-reply is attached and is limited solely to responding to these new matters. It does not exceed 3  
2 pages.

3  
4 Plaintiff respectfully requests leave to file the attached sur-reply to ensure full and fair  
5 consideration of the jurisdictional issues under 25 U.S.C. § 1303.

6  
7 Respectfully submitted,

8  
9 March 04,2026

10  
11 Crystal Bowman  
12 Plaintiff, Pro Se

13  
14  A handwritten signature in blue ink that reads "Crystal Bowman". The signature is written in a cursive style and is positioned above a horizontal line that extends across the page.