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17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF CALIFORNIA

19 SAN LUIS & DELTA-MENDOTA WATER  
AUTHORITY, *et al.*,

20 Plaintiffs,  
21

22 v.

23 UNITED STATES DEPARTMENT OF THE  
24 INTERIOR, *et al.*,

25 Defendants.  
26  
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Case No. 1:11-cv-00952-LJO-GSA

**FOURTH STIPULATION AND ORDER  
REGARDING MOTION FOR  
ATTORNEYS' FEES AND OTHER  
EXPENSES**

Judge: Hon. Lawrence J. O'Neill

1 To facilitate settlement discussions regarding Plaintiff San Luis & Delta-Mendota Water  
2 Authority's ("Authority") claim for attorneys' fees and other expenses in this case, the Authority  
3 and Defendants United States Department of Interior, Sally Jewell, Secretary of Interior, et al.  
4 ("Defendants") previously stipulated to, and the Court has ordered, a stay on briefing and  
5 argument of the Authority's motion for attorneys' fees and other expenses. Doc. 127, Doc. 129,  
6 Doc. 131. These parties have reached a recommended agreement in principle to settle the  
7 Authority's fees claim, subject to review within the Department of Justice and the Department of  
8 the Interior. To allow for additional time for the review of the proposed settlement, the  
9 Authority and Defendants jointly request that this Court extend the stay to the date of August 26,  
10 2016.

11 In support of this request, the Authority and Defendants stipulate as follows:

12 1. On October 15, 2015, the Authority filed a motion for an award of attorneys' fees  
13 and other expenses for this litigation. Doc. 120.

14 2. On October 16, 2015, the Court approved the parties' stipulation to stay briefing  
15 and argument on the Authority's motion for attorneys' fees for 120 days, until February 13,  
16 2016, to allow for settlement discussions. Doc. 127.

17 3. On February 17, 2016, the Court approved the parties' stipulation to stay briefing  
18 and argument on the Authority's motion for attorneys' fees for an additional 60 days, until April  
19 14, 2016, to allow for further settlement discussions. Doc. 129.

20 4. On April 12, 2016, the Court approved the parties' stipulation to stay briefing and  
21 argument on the Authority's motion for attorneys' fees until July 13, 2016. Doc. 131.

22 5. The Authority and Defendants have reached a recommended agreement in  
23 principle to settle the Authority's claim for fees and expenses. Before any settlement can be  
24 concluded however, the proposed settlement terms must be reviewed and approved within the  
25 Department of Justice and the Department of Interior. If the recommended agreement is  
26 eventually adopted, the Authority and Defendants agree that further briefing and argument on the  
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EXPENSES

1 Authority's claim for fees and other expenses, and a decision by the Court, will be unnecessary.  
2 A stay will therefore conserve the parties' and the Court's resources.

3 6. The parties anticipate that this will be the last extension of time required and that  
4 the extension will allow sufficient time to implement the settlement.

5 Based on the joint stipulation set forth above, the parties respectfully request that this  
6 Court extend the stay of briefing and argument on the Authority's motion for attorneys' fees and  
7 other expenses until August 26, 2016, in the manner provided above.

8 Respectfully submitted this 8th day of July, 2016.

9  
10 Dated: July 8, 2016

KRONICK, MOSKOVITZ, TIEDEMANN &  
GIRARD  
DIEPENBROCK ELKIN GLEASON, LLP

12 /s/ Daniel J. O'Hanlon per authorization given on  
13 By: 7/8/2016

Daniel J. O'Hanlon  
Eileen M. Diepenbrock  
Attorneys for Plaintiff SAN LUIS & DELTA-  
MENDOTA WATER AUTHORITY

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EXPENSES  
11-cv-00952

1 Dated: July 8, 2016

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5 JOHN C. CRUDEN  
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6 By: Devon Lehman McCune  
7 DEVON LEHMAN McCUNE  
8 Senior Attorney  
9 U.S. Department of Justice  
10 Environment & Natural Resources Division  
11 Attorneys for Defendants

12 IT IS SO ORDERED.

13 Dated: July 13, 2016

14 /s/ Lawrence J. O'Neill  
15 UNITED STATES CHIEF DISTRICT JUDGE

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