

1 Jason R. Flanders (SBN 238007)  
AQUA TERRA AERIS LAW GROUP  
2 490 43<sup>rd</sup> St., Ste. 108  
Oakland, CA 94609  
3 Phone: 916-202-3018  
4 Email: jrf@atalawgroup.com

5 Michael B. Jackson (SBN 53808)  
P.O. Box 207  
6 75 Court Street  
Quincy, CA 95971  
7 Phone: 530-283-1007  
8 Email: mjatty@sbcglobal.net

9 *Attorneys for Petitioners and Plaintiffs AquAlliance and*  
10 *California Sportfishing Protection Alliance*

11 Patrick M. Soluri (SBN 210036)  
Osha R. Meserve (SBN 204240)  
12 SOLURI MESERVE, A LAW CORPORATION  
510 8th Street  
13 Sacramento, CA 95814  
Phone: (916) 455-7300  
14 Email: patrick@semlawyers.com; osha@semlawyers.com

15 *Attorneys for Petitioners and Plaintiffs Local Agencies of the North Delta,*  
16 *Central Delta Water Agency, South Delta Water Agency*

17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF CALIFORNIA

19 AQUALLIANCE; CALIFORNIA  
SPORTFISHING PROTECTION ALLIANCE;  
20 CENTRAL DELTA WATER AGENCY;  
SOUTH DELTA WATER AGENCY; LOCAL  
21 AGENCIES OF THE NORTH DELTA,

22 Petitioners and Plaintiffs,

23 v.

24 THE UNITED STATES BUREAU OF  
RECLAMATION; SAN LUIS & DELTA-  
MENDOTA WATER AUTHORITY; U.S.  
25 FISH AND WILDLIFE SERVICE; U.S.  
DEPARTMENT OF THE INTERIOR; SALLY  
26 JEWELL, in her official capacity; and DOES 1  
– 100,

27 Respondents and Defendants.  
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1:15-cv-00754-LJO-BAM

JOINT STIPULATION TO STAY  
SUPPLEMENTAL FILING FOR  
MOTION/PETITION FOR ATTORNEY'S  
FEES, COSTS, AND EXPENSES; ORDER

Honorable Lawrence O'Neill

1 **STIPULATION**

2 Plaintiffs, AquAlliance, California Sportfishing Protection Alliance, Central Delta Water  
3 Agency, South Delta Water Agency and Local Agencies of the North Delta; and Federal Defendants  
4 United States Bureau of Reclamation, United States Fish and Wildlife Service, and San Luis and Delta-  
5 Mendota Water Authority file this Joint Stipulation and Proposed Order to stay for a period of sixty (60)  
6 days after mandate issues from the Ninth Circuit Court of Appeals, the supplemental and response  
7 filings regarding Plaintiffs’ Preliminary Motion/Petition for Attorneys’ Fees, Costs, and Expenses,  
8 previously filed on July 23, 2018 (ECF No. 87).

9 WHEREAS, on June 29, 2018, the Parties lodged a Proposed Final Judgment with the intent that  
10 all applicable timelines regarding Plaintiffs’ claims for recovery of fees and costs be extended at least  
11 thirty (30) days to enable sufficient time for the parties to meet and confer and negotiate in good faith in  
12 an attempt to resolve Plaintiffs’ claims without further litigation;

13 WHEREAS, on July 5, 2018, the Court entered Judgment in this matter;

14 WHEREAS, the parties met and conferred and desire additional time to negotiate in good faith to  
15 attempt to resolve Plaintiffs’ claims without further litigation;

16 WHEREAS, Plaintiffs filed a Stipulation and Proposed Order along with a Preliminary  
17 Motion/Petition for Attorneys’ Fees, Costs, and Expenses, providing that Plaintiffs would have until  
18 September 5th, to file a Supplemental Motion/Petition for Attorneys’ Fees, Costs, and Expenses, and  
19 Supplemental Memorandum in Support thereof, which was approved by the Court on July 26, 2018  
20 (ECF No. 88);

21 WHEREAS, Federal Defendants filed a Notice of Appeal on August 31, 2018 (Case no. 18-  
22 16780); and,

23 WHEREAS, Plaintiffs filed a Cross Appeal on September 14, 2018 (Case no. 18-16666);

24 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE:

25 To stay all deadlines regarding the supplemental and response filings regarding Plaintiffs’  
26 Preliminary Motion/Petition for Attorneys’ Fees, Costs, and Expenses until sixty (60) days after  
27 mandate issues from the 9th Circuit Court of Appeals.  
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Dated: September 25, 2018

AQUA TERRA AERIS LAW GROUP

By: /s/ Jason R. Flanders  
Jason R. Flanders  
Attorneys for Petitioners  
AquAlliance, California Sportfishing  
Protection Alliance

Dated: September 25, 2018

SOLURI MESERVE, A LAW CORPORATION

By: /s/ Patrick M. Soluri  
Patrick M. Soluri  
Attorney for Plaintiffs  
Local Agencies of the North Delta, Central  
Delta Water Agency, South Delta Water Agency

Dated: September 25, 2018

PIONEER LAW GROUP

By: \_\_\_\_/s/ Andrea A. Matarazzo  
Andrea A. Matarazzo  
Attorneys for Defendant/Respondent,  
San Luis & Delta-Mendota Water Authority

1 Dated: September 25, 2018

JEFFREY H. WOOD  
Acting Assistant Attorney General

2 By: /s/ Lee Leininger  
3 R. LEE LEININGER  
4 Natural Resources Section  
5 999 18th Street  
6 South Terrace, Suite 370  
7 Denver, CO 80202  
8 Phone: (303) 844-1364; Fax: (303) 844-1350  
9 lee.leininger@usdoj.gov

10 CLIFFORD E. STEVENS, JR.  
11 U.S. Department of Justice  
12 Environment & Natural Resources Division  
13 Wildlife & Marine Resources Section  
14 Ben Franklin Station, P.O. Box 7611  
15 Washington, D.C. 20044-7611  
16 Telephone: (202) 353-7548  
17 Facsimile: (202) 305-0275  
18 Email: clifford.stevens@usdoj.gov

19 Attorneys for Federal Defendants

20 **ORDER**

21 Pursuant to Stipulation of the Parties, it is so ORDERED:

22 The supplemental and response filings regarding Plaintiffs' Preliminary Motion/Petition for  
23 Attorneys' Fees, Costs, and Expenses is stayed until sixty (60) days after mandate issues from the 9th  
24 Circuit Court of Appeals.

25 IT IS SO ORDERED.

26 Dated: September 26, 2018

27 /s/ Lawrence J. O'Neill  
28 UNITED STATES CHIEF DISTRICT JUDGE