1 BENJAMIN B. WAGNER **United States Attorney** EDWARD A. OLSEŇ, CSBN 214150 2 Assistant United States Attorney 501 I Street, Suite 10-100 Sacramento, California 95814 Telephone: (916) 554-2821 4 Facsimile: (916) 554-2900 5 Email: edward.olsen@usdoj.gov Attorneys for Defendants 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF CALIFORNIA 10 11 SACRAMENTO MUNICIPAL UTILITY CASE NO. 2:12-CV-03112-TLN-EFB DISTRICT, 12 Plaintiff, **CORRECTED STIPULATION TO** 13 EXTEND THE STAY OF v. PROCEEDINGS; AND ORDER 14 UNITED STATES DEPARTMENT OF THE 15 INTERIOR, ET AL., 16 Defendants. 17 18 Plaintiff, by and through its attorneys of record, and defendants, by and through their attorneys 19 of record, hereby stipulate, subject to approval of the Court, to extend the stay of proceedings in this 20 21 action from September 9, 2013, to November 27, 2013, so as to allow time for continued negotiations between the parties and a potential resolution of the action. The parties have met multiple times during 22 the initial stay of proceedings, have made progress towards resolution, and believe that a brief 23 extension of the stay of proceedings could result in a mutual agreement that would result in dismissal 24 of this action. 25 If no resolution of this action occurs by November 27, 2013, the parties agree to prepare and 26 file a supplemental joint status report with a proposed briefing schedule by December 20, 2013. 27 28 STIPULATION TO EXTEND STAY OF PROCEEDINGS; ORDER

1	The parties preserve all claims, defenses, objections, or legal arguments that they have or may
2	have in the action. The parties' stipulation and the stay of this action shall not affect or impact the
3	parties' claims, defenses, objections, or arguments.
4	
5	Dated: September 6, 2013 BENJAMIN B. WAGNER UNITES STATES ATTORNEY
6	By: /s/ Edward A. Olsen
7	EDWARD A. OLSEN
8	Assistant United States Attorney Attorneys for Defendants
9	
10	Dated: September 6, 2013 DOWNY BRAND LLP
11	By: <u>/s/ Meredith E. Nikkel</u> MEREDITH E. NIKKEL
12	STEVE P. SAXTON DAVID E. LINDGREN
13	Attorneys for Plaintiff
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15	ORDER
16	ORDER
17	Pursuant to stipulation, IT IS SO ORDERED.
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19	Date: September 13, 2013
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24	Troy L. Nunley United States District Judge
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