

1 BENJAMIN B. WAGNER
 United States Attorney
 2 EDWARD A. OLSEN (CSBN 214150)
 Assistant United States Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2821
 Facsimile: (916) 554-2900
 5 edward.olsen@usdoj.gov

6 Attorneys for Defendants

7

8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10

11 SACRAMENTO MUNICIPAL UTILITY DISTRICT,

Plaintiff,

13 v.

14 UNITED STATES DEPARTMENT OF THE INTERIOR, ET AL.,

Defendants.

CASE NO. 2:12-CV-03112-TLN-EFB

**STIPULATION TO EXTEND THE
 STAY OF PROCEEDINGS; AND
 ORDER**

17

18 Plaintiff, by and through its attorneys of record, and defendants, by and through their
 19 attorneys of record, hereby stipulate, subject to approval of the Court, to extend the stay of
 20 proceedings in this action to January 24, 2014, so as to allow time for continued negotiations
 21 between the parties and a potential resolution of the action. The parties have met and conferred
 22 multiple times during the stay of this proceeding, have made substantial progress towards resolution,
 23 and believe that a short extension of the stay of proceeding could result in a resolution of the
 24 underlying issues and a dismissal of the action.

25 If no resolution of this action occurs by January 24, 2014, the parties agree to prepare and file
 26 a supplemental joint status report with a proposed briefing schedule by February 7, 2014.

27

28

STIPULATION AND ORDER TO EXTEND THE STAY
 OF PROCEEDINGS

1 The parties preserve all claims, defenses, objections, and legal arguments 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 Dated: December 19, 2013

BENJAMIN B. WAGNER
UNITED STATES ATTORNEY

5
6 */s/ Edward A. Olsen*
EDWARD A. OLSEN
7 Assistant United States Attorney
8 Attorneys for Defendants

9 Dated: December 19, 2013

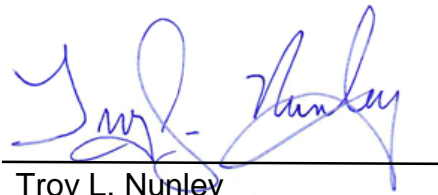
DOWNEY BRAND LLP

10 */s/ Meredith E. Nikkel*
MEREDITH E. NIKKEL
11 STEVE P. SAXTON
12 DAVID E. LINDGREN
13 Attorneys for Plaintiff
14

15 **[PROPOSED] ORDER**

16 Pursuant to stipulation, IT IS SO ORDERED.

17
18 Dated: December 20, 2013

19
20 
21 _____
Troy L. Nunley
22 United States District Judge
23
24
25
26
27
28