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4 Attorneys for Plaintiffs
 5 JAMESON BEACH PROPERTY OWNERS
 6 ASSOCIATION, GENE LANDON, and HELEN
 NICOLAIDES

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 10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA
 12 SACRAMENTO DIVISION
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14 JAMESON BEACH PROPERTY OWNERS’
 15 ASSOCIATION, an unincorporated
 association; GENE LANDON, an individual;
 16 and HELEN NICOLAIDES,

Case No.: 2:13-CV-01025

**STIPULATION AND ORDER TO STAY
 LITIGATION TO ALLOW FOR
 SETTLEMENT DISCUSSIONS**

17 Plaintiffs,

18 vs.

19 THE UNITED STATES OF AMERICA,
 20 UNITED STATES DEPARTMENT OF
 AGRICULTURE, FOREST SERVICE, a
 21 government entity; EL DORADY COUNTY,
 a government entity; STATE OF
 22 CALIFORNIA [CALTRANS], a government
 entity; and DOES 1 through 25, inclusive,
 23

24 Defendants.

25 Plaintiffs, by and through their attorney Jacqueline Mittelstadt, and Defendants, El Dorado
 26 County (“County”), and, Kris Knox and Camp Richardson Resort, LLC. (“Camp Richardson
 27 Defendants), by and through their attorneys respectively, Mason · Thomas, and Brooke · Shaw ·
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1 Zumpft, hereby submit their request to stay this litigation and allow the parties to pursue
2 amicable settlement discussions, and hereby stipulate as follows:

3 A. The time frame within which the parties propose the settlement negotiations will be
4 completed by is January 30, 2014 or any appropriate date set by this Court.

5 B. The Camp Rich Defendants and Plaintiffs have agreed to commence discussions on the
6 earliest date all parties are available: November 1, 2013. A second meeting to include El
7 Dorado County is in the process of being scheduled at the earliest available date in late
8 November 2013.

9 C. The Camp Rich Defendants and Plaintiffs hereby agree to defer formal service of the
10 Summons and Complaint until thirty days after expiration of the stay of litigation entered into
11 by way of this Stipulation. The parties further agree that upon Plaintiffs receipt of a written
12 indemnity agreement, including confirmation that any and all actions and omissions by Mr.
13 Knox will be assumed by Camp Richardson Resort, LLC., Plaintiffs will dismiss Mr. Knox
14 from the instant lawsuit with prejudice. It is agreed that participation in this Stipulation does not
15 constitute an appearance for any purpose.

16 D. The parties herein agree to a stay of all discovery. The parties also agree that during the
17 discovery stay, either party may informally request documents from the other party, and the
18 parties agree to meet and confer in response to any such informal request in an attempt to reach
19 a resolution.

20 C. Plaintiff's counsel has discussed with the remaining Defendants consent to stay
21 litigation to pursue a global resolution and discussions are continuing. Caltrans was recently
22 served and is in the process of ascertaining counsel assigned to this matter. The US Forest
23 Service and Ms. Nancy Gibson were recently personally served, and prefer to wait until closer
24 to their October deadline to file a responsive pleading before agreeing to a formal stay. They
25 are committed to participate in the Nov. 1, 2013 meeting. Finally, Caltrans legal representatives
26 are aware of the Nov. 1, 2013 date, and late November date in process of being scheduled.

1 IT IS SO STIPULATED:
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3 Dated: September 19, 2013
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TAHOE LAW CENTER

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6 By: /s/
7 Jacqueline Mittelstadt
8 Attorneys for Plaintiffs
9 JAMESON BEACH PROPERTY
10 OWNERS ASSOCIATION, GENE
11 LANDON, and HELEN NICOLAIDES

MASON · THOMAS

12
13 By: /s/
14 Stephen A. Mason
15 Attorneys for Defendant
16 EL DORADO COUNTY

BROOKE · SHAW · ZUMPFT

17
18 By: /s/
19 T. Scott Brooke
20 Attorney's for Defendant
21 CAMP RICHARDSON RESORT, LLC
22 and KRIS KNOX
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ORDER

Pursuant to the provisions above, the litigation is hereby stayed until February 1, 2014.

Not later than ten (10) days after settlement negotiations conclude on January 30, 2014, the parties are directed to inform this Court of the status of this case and move to lift the stay.

IT IS SO ORDERED.

Dated: September 26, 2013



MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT

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