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 SHINGLE SPRINGS BAND OF MIWOK
 9 INDIANS, SHINGLE SPRINGS TRIBAL
 HEALTH PROGRAM, SHINGLE
 10 SPRINGS TRIBAL HEALTH PROGRAM,
 and BRENDA ADAMS
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12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA
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15 BETH A. BODI,
 16 Plaintiff,
 17 vs.
 18 SHINGLE SPRINGS BAND OF MIWOK
 INDIANS; SHINGLE SPRINGS TRIBAL
 19 HEALTH PROGRAM; SHINGLE SPRINGS
 TRIBAL HEALTH; BRENDA ADAMS (as
 20 current Chairperson of the Shingle Springs
 Tribal Health Board), and DOES 1 through
 21 30, inclusive,
 22 Defendants.
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Case No. 2:13-CV-01044 LKK-CKD

**STIPULATION AND ORDER
 CONTINUING SCHEDULING
 CONFERENCE AND STAYING
 ACTION**

The Hon. Lawrence K. Karlton
 Complaint Filed: April 22, 2013

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 25 Plaintiff Beth A. Bodi and defendants Shingle Springs Band Of Miwok Indians, Shingle
 26 Springs Tribal Health Program, Shingle Springs Tribal Health Board, and Brenda Adams
 27 (collectively "Parties"), by and through their counsel of record respectfully request that the Court
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1 give effect to the Parties' stipulation and stay this action to permit the Parties to explore settlement
2 of their dispute, as follows:

3 WHEREAS, defendants' motion to dismiss plaintiff's second amended complaint came on
4 for hearing before the Court on March 3, 2014;

5 WHEREAS, at the hearing, the Court took defendants' motion to dismiss under
6 submission and indicated a written order would follow;

7 WHEREAS, the Parties wish to explore settlement discussions before the Court issues its
8 order on defendants' motion;

9 WHEREAS, the Parties believe the Court's issuance of an order on defendants' motion
10 would likely be counterproductive to settlement efforts;

11 WHEREAS, a scheduling conference in this matter is currently scheduled for March 31,
12 2014, with a joint status report due March 17, 2014;

13 WHEREAS, the Parties believe that settlement negotiations will require significant time
14 because plaintiff is currently hospitalized and because any settlement requires approval by a Tribal
15 government, the Tribal Council of the Shingle Springs Band of Miwok Indians, which convenes
16 only periodically; and

17 WHEREAS, the Parties believe that a stay of this matter could resolve this action without
18 the need for further proceedings before this Court.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the Parties
20 that:

- 21 1. The scheduling conference scheduled for March 31, 2014, should be continued to
22 May 19, 2014, at 10:30 a.m., or to a date and time thereafter convenient to the Court;
- 23 2. All proceedings in this matter should be stayed until at least May 5, 2014;
- 24 3. No later than May 1, 2014, the Parties shall submit either (1) a joint statement
25 indicating that settlement efforts are ongoing and requesting that the action remain stayed until a
26 specified date, or (2) a joint status report pursuant to Fed. R. Civ. P. 26(f).
- 27 4. Counsel for plaintiff and defendants respectfully and jointly request that the Court
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not issue an order on defendants' motion to dismiss until the requested stay of this action ends.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: March 4, 2014

AD ASTRA LAW GROUP, LLP

By /s/ Wendy L. Hillger (approved March 4, 2013)
WENDY L. HILLGER

Attorneys for Plaintiff
BETH A. BODI

Dated: March 4, 2014

DENTONS US LLP

By /s/ Ian R. Barker
IAN R. BARKER

Attorneys for Defendants
SHINGLE SPRINGS BAND OF MIWOK
INDIANS, SHINGLE SPRINGS TRIBAL
HEALTH PROGRAM, SHINGLE SPRINGS
TRIBAL HEALTH BOARD, and BRENDA
ADAMS

