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 CALIFORNIA SPORTFISHING PROTECTION ALLIANCE

13 **UNITED STATES DISTRICT COURT**  
 14 **EASTERN DISTRICT OF CALIFORNIA**

15 CALIFORNIA SPORTFISHING PROTECTION  
 16 ALLIANCE , a non-profit corporation,

17 Plaintiff,

18 vs.

19 DRAGON ESP LTD., a corporation,

20 Defendant.

Case No. 2:14-CV-01380-TLN-AC

**STIPULATION AND ORDER  
 EXTENDING TIME FOR  
 SUBMISSION OF JOINT STATUS  
 REPORT**

Assigned to: District Judge Troy L.  
 Nunley

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 23  
 24 Plaintiff California Sportfishing and Protection Alliance (“CSPA”) and Defendant Dragon  
 25 Products ESP, Ltd. (“Dragon”) (together, the “Parties”), through their respective counsel of record,  
 26 hereby stipulate to, and seek the Court’s approval of, an order extending time to submit the joint  
 27 status report contemplated by Paragraph 4 of the Court’s June 9, 2014 Order Requiring Joint Status  
 28 Report (the “June 9 Order”). The June 9 Order directs the Parties to submit a joint status report

1 within 60 days of service of CSPA's Complaint for Declaratory and Injunctive Relief and Civil  
2 Penalties (the "Complaint").

3 **RECITALS**

4 WHEREAS, CSPA commenced this action with the filing of its Complaint, on June 9, 2014;

5 WHEREAS, by letter dated September 26, 2014, CSPA asked Dragon to waive service of  
6 summons; and Dragon executed a Waiver of Service of Summons on September 29, 2014;

7 WHEREAS, the Court issued its June 9 Order, which by its terms would require the Parties  
8 to submit their joint status report on or before November 25, 2014;

9 WHEREAS, the Parties have been engaged in discussions aimed at resolving this dispute,  
10 and those discussions have been productive;

11 WHEREAS, in light of the substantial progress the Parties have made towards settlement, the  
12 Parties believe it would minimize the burden on the Court and conserve the Parties' resources to  
13 defer the preparation, submission and consideration of the joint status report for a short time;

14 WHEREAS, consistent with the progress towards settlement, the Parties have stipulated and  
15 agreed to extend Dragon's deadline to move, answer, or otherwise respond to the Complaint by 28  
16 days, to and including December 23, 2014, pursuant to Local Rule 144(a); and

17 WHEREAS, the Parties believe that by late January, they should either have reached a  
18 settlement of this matter or have determined that they will be unable to agree upon terms of a  
19 settlement in the present posture of the dispute such that it would then be appropriate to return to a  
20 normal litigation posture.

21 **STIPULATION**

22 IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, through their  
23 respective undersigned counsel, and subject to the approval of the Court, that the Parties will  
24 continue working to resolve this dispute through settlement. To the extent the Parties have not by  
25 then already submitted a proposed consent decree or other settlement paper to the Court, the Parties'

26 ///

27 ///

28 ///

1 deadline to submit a joint status report as contemplated by the Court's June 9 Order shall be  
2 extended to and including January 23, 2015.

3  
4 Dated: November 20, 2014

VINSON & ELKINS LLP

5  
6 By: /s/ Michael L. Charlson  
Michael L. Charlson

7 Attorneys for Defendant  
8 DRAGON ESP, LTD.

9 Dated: November 20, 2014

LOZEAU DRURY LLP

10 By: /s/ Douglas J. Chermak (as authorized on  
11 November 20, 2014)  
Douglas J. Chermak

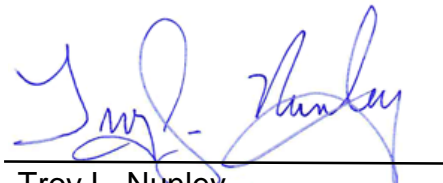
12 Attorneys for Plaintiff  
13 CALIFORNIA SPORTFISHING PROTECTION  
14 ALLIANCE

15 **ORDER**

16 Pursuant to stipulation of the Parties and for good cause shown, it is HEREBY ORDERED  
17 that the Parties' deadline to submit a joint status report as contemplated by the Court's June 9 Order  
18 be, and hereby is, extended to and including January 23, 2015 unless the Parties have by that date  
19 submitted proposed consent decree or other paper reflecting settlement of this action.

20 IT IS SO ORDERED.

21  
22 Dated: November 20, 2014

23  
24   
25 Troy L. Nunley  
26 United States District Judge