

1 Michael R. Lozeau (Bar No. 142893)
 2 Douglas J. Chermak (Bar No. 233382)
 3 LOZEAU DRURY LLP
 4 410 12th Street, Suite 250
 5 Oakland, CA 94607
 6 Telephone: 510.836.4200
 7 Facsimile: 510.836.4205
 8 E-mail: Doug@lozeaudrury.com

9 Andrew L. Packard (State Bar No. 168690)
 10 Megan E. Truxillo (State Bar No. 275746)
 11 LAW OFFICES OF ANDREW L. PACKARD
 12 100 Petaluma Blvd. N., Suite 301
 13 Petaluma, CA 94952
 14 Tel: (707) 763-7227
 15 Fax: (707) 763-9227
 16 E-mail: Andrew@PackardLawOffices.com

17 Attorneys for Plaintiff CALIFORNIA
 18 SPORTFISHING PROTECTION ALLIANCE

19 Downey Brand LLP
 20 MELISSA A THORME (Bar No. 151278)
 21 ROBERT P. SORAN (Bar No. 169577)
 22 621 Capitol Mall, 18th Floor
 23 Sacramento, CA 95814-4731
 24 Telephone: 916.444.1000
 25 Facsimile: 916.444.2100
 26 mthorme@downeybrand.com
 27 rsoran@downeybrand.com

28 Attorneys for Defendant
 JEFFREY BEARD, in his official capacity

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
 PROTECTION ALLIANCE,
 a non-profit corporation,

Plaintiff,

v.

JEFFEY BEARD, in his official capacity
 as Secretary of the California Department
 of Corrections and Rehabilitation,

Defendant.

Case No. 2:15-CV-01027-TLN-EFB

**STIPULATION AND ORDER FOR
 CONTINUED STAY**

(Federal Water Pollution Control Act,
 33 U.S.C. §§1251 to 1387)

1 Plaintiff California Sportfishing Protection Alliance (“CSPA”) and Defendant Jeffrey
2 Beard, in his official capacity as Secretary of the California Department of Corrections and
3 Rehabilitation (“Beard”) (collectively “Parties”), previously filed a stipulation and request that
4 the Court continue its May 12, 2015, order (filed on May 12, 2015 as Document No. 3) and stay
5 all proceedings in this case temporarily. The Parties so stipulated to conserve their resources
6 pending ongoing settlement negotiations to address the allegations contained in the Complaint.
7 The Court granted this stipulation on June 1, 2015.

8 In order to continue on-going settlement negotiations, and without waiving any rights,
9 claims, or defenses the Parties may have as of the date of this stipulation, the Parties agree and
10 request that the above-captioned matter is stayed for all purposes for an additional two (2) months
11 from the date of the Court’s order approving this continued stay. As before, this stay may be
12 requested to be extended by stipulation or motion if settlement is not completed within 2 months.

13 The Parties also agree, subject to Court approval, to continue the deadlines for all filings
14 and/or requirements in the Federal Rules of Civil Procedure and the Local Rules related to or
15 triggered by the service of the Complaint, if any, to new dates set after the expiration of this stay.

16 Respectfully submitted,
17
18
19
20
21
22
23
24
25
26
27
28

