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16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**
 18 **SACRAMENTO**

20 Citizens Against Corporate Crime, LLC, as
 21 Relator,

22 Plaintiff,

23 v.

24 Lennar Corporation and Does 1 through 100,
 25 inclusive,

26 Defendants.

Case No. 2:18-cv-01269-TLN-DB

Hon. Troy L. Nunley

Hon. Deborah Barnes

**JOINT STIPULATION FOR STAY
 PENDING RESOLUTION OF
 DELAWARE BANKRUPTCY
 PROCEEDINGS**

1 This stipulation is made by and between Relator Citizens Against Corporate Crime, LLC
2 (“CACC”), on the one hand, and defendant Lennar Corporation (“Lennar”), on the other hand,
3 through their respective undersigned counsel of record, with reference to the following facts:

4 **WHEREAS**, on February 24, 2017, Relator commenced this action by filing under seal a
5 complaint in the Superior Court of the State of California, County of Sacramento captioned
6 *Citizens Against Corporate Crime, LLC v. Lennar Corporation and Does 1 Through 100*, Case
7 No. 34-2017-00208469 (the “State Court Action”). CACC filed under seal a First Amended
8 Complaint in the State Court Action on October 24, 2017;

9 **WHEREAS**, on January 24, 2018, the California Superior Court issued an order lifting
10 the seal on the case (Dkt. 1-1 at 64-65);

11 **WHEREAS**, Lennar was served with the Complaint on April 17, 2018 (Dkt. 1 at 2);

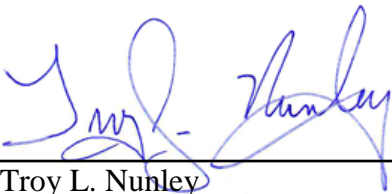
12 **WHEREAS**, on May 17, 2018, Lennar timely filed a Notice of Removal with this Court
13 pursuant to 28 U.S.C. §§ 1441, 1446, and 1452(a). Among other things, the Notice of Removal
14 notified the Court that Relator’s claims arise in, arise under, and relate to the prior jointly
15 administered Chapter 11 bankruptcy cases of LandSource Communities Development LLC and
16 certain of its affiliates captioned *In re LandSource Communities Development LLC et al.*,
17 Case No. 08-11111 (Bankr. D. Del.) (the “Chapter 11 Cases”). The Notice of Removal informed
18 the Court that Lennar intended to “promptly file” in the bankruptcy court a Motion to Reopen the
19 Chapter 11 Cases for the Limited Purpose of Enforcing the Injunction and Release in the Chapter
20 11 Plan (*see* Dkt. 1);

21 **WHEREAS**, the following day, on May 18, 2018, Lennar commenced proceedings in
22 Delaware by filing a Motion to Reopen the Chapter 11 Bankruptcy Cases for the Limited Purpose
23 of Enforcing the Injunction and Release in the Debtors’ Joint Chapter 11 Plan and Confirmation
24 Order (the “Motion to Reopen”) and attached to its Motion to Reopen a [Proposed] Motion to
25 Enforce the Injunction and Release in the Debtors’ Joint Chapter 11 Plan and Confirmation
26 Order. Lennar’s motions filed with the bankruptcy court are attached to this stipulation as
27 **Exhibit A** (the “Delaware Action”);

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IT IS SO ORDERED.

Date: June 4, 2018



Troy L. Nunley
United States District Judge