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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 May 31, 2018, the parties filed a joint stipulation requesting a stay of
5 proceedings in the above-captioned matter pending resolution of Lennar’s Motion to Reopen the
6 Chapter 11 Bankruptcy Cases for the Limited Purpose of Enforcing the Injunction and Release in
7 the Debtors’ Joint Chapter 11 Plan and Confirmation Order (the “Motion to Reopen”), which was
8 filed in the United States Bankruptcy Court for the District of Delaware on May 18, 2018 in the
9 matter captioned *In re LandSource Communities Development LLC*, Case No. 08-1111 (Bankr. D.
10 Del.);

11 **WHEREAS**, on June 5, 2018, this Court entered an Order granting the parties’ joint
12 request for a stay and providing that all deadlines in these proceedings were stayed pending
13 resolution by the bankruptcy court of Lennar’s Motion to Reopen (Dkt. 13);

14 **WHEREAS**, on July 17, 2018, the Honorable Kevin J. Carey of the Delaware Bankruptcy
15 Court entered an order granting Lennar’s Motion to Reopen and instructing Lennar to file its
16 Motion to Enforce the Injunction and Release in the Debtors’ Joint Chapter 11 Plan and
17 Confirmation Order (“Enforcement Motion”). A true and correct copy of the Delaware
18 Bankruptcy Court’s Order is attached hereto as Exhibit 1;

19 **WHEREAS**, the Delaware Bankruptcy Court has set a hearing on Lennar’s Enforcement
20 Motion for October 24, 2018;

21 **WHEREAS**, the parties agree it would save judicial resources and avoid the risk of
22 inconsistent results in parallel proceedings to allow the Delaware Bankruptcy Court an
23 opportunity to hear and rule on Lennar’s Enforcement Motion before proceedings in this Court (if
24 any) should proceed;

25 **WHEREAS**, to that end, the parties respectfully jointly request a stay of proceedings in
26 this Court pending resolution by the Delaware Bankruptcy Court of Lennar’s Enforcement
27 Motion;

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