1	robertbarnes@barneslawllp.com BARNES LAW	
2		
3	22631 Pacific Coast Hwy, Suite 362 Malibu, CA 90265	
4	Telephone: (310) 510-6211 Facsimile: (310) 510-6225	
5	Attorneys for Relator Citizens	
6	Against Corporate Crime LLC	
7	DANIEL M. PETROCELLI (S.B. #97802)	
8	dpetrocelli@omm.com EVAN M. JONES (S.B. #115827) ejones@omm.com DAVID MARROSO (S.B. #211655) dmarroso@omm.com MEGAN K. SMITH (S.B. #307381)	
9		
10		
11	megansmith@omm.com O'MELVENY & MYERS LLP	
12	1999 Avenue of the Stars, 8th Floor Los Angeles, California 90067-6035	
13	Telephone: +1 310 553 6700 Facsimile: +1 310 246 6779	
14	Attomosya for Defendant	
15	Attorneys for Defendant Lennar Corporation	
16	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA	
17		
18	SACRAMENTO	
19		
20	Citizens Against Corporate Crime, LLC, as	Case No. 2:18-cv-01269-TLN-DB
21	Relator, Plaintiff,	Hon. Troy L. Nunley
22		Hon. Deborah Barnes
23	V.	JOINT STIPULATION FOR STAY
24	Lennar Corporation and Does 1 through 100, inclusive,	PENDING RESOLUTION OF DELAWARE BANKRUPTCY
25	Defendants.	PROCEEDINGS
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This stipulation is made by and between Relator Citizens Against Corporate Crime, LLC ("CACC"), on the one hand, and defendant Lennar Corporation ("Lennar"), on the other hand, through their respective undersigned counsel of record, with reference to the following facts:

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

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

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

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

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

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

1	WHEREAS, this Court has inherent authority to stay this case pending resolution of	
2	Lennar's Enforcement Motion by the Delaware Bankruptcy Court, see CMAX, Inc. v. Hall, 300	
3	F.2d 265, 268 (9th Cir. 1962);	
4	BASED UPON THE FOREGOING, THE PARTIES HEREBY STIPULATE and	
5	request that the Court enter an Order that:	
6	1. This case and all deadlines in place pursuant to the federal rules, the local rules,	
7	and the Court's Initial Pretrial Scheduling Order (Dkt. 2) be stayed pending	
8	resolution by the bankruptcy court of Lennar's Enforcement Motion;	
9	2. The stay is entered without prejudice to the parties' ability to later amend their	
10	pleadings;	
11	3. The stay is entered without prejudice to Defendant's ability to later seek transfer or	
12	this matter to the District of Delaware; and	
13	4. The stay is entered without prejudice to the parties' ability to later petition	
14	(individually or together) the Court to lift the stay.	
15	IT IS SO STIPULATED.	
16	By: /s/ Robert Barnes (as authorized 08/13/18) Robert Barnes	
17	Attorneys for Relator	
18	O'MELVENY & MYERS LLP	
19	By: /s/ David Marroso	
20	David Marroso Attorneys for Defendant	
21		
22	IT IS SO ORDERED.	
23		
24	Dated: August 16, 2018	
25	Van Vanley	
26	Troy L. Nunley	
27	United States District Judge	
28		