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Attorneys for Plaintiff the United States

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **OAKLAND DIVISION**

)	
THE UNITED STATES OF AMERICA,)	Civil Action No. 4-09-CV-00437-PJH
)	
Plaintiff,)	STIPULATED AGREEMENT AND
)	[PROPOSED] ORDER
v.)	REQUESTING STAY AS A
)	RESULT OF PARTIES REACHING
THE CALIFORNIA DEPARTMENT OF)	AGREEMENT IN PRINCIPLE
TRANSPORTATION,)	
)	
Defendant.)	
)	

22 1. The United States and the California Department of Transportation (“Caltrans”)
 23 (jointly “Parties”) have reached an agreement in principle that would resolve the instant
 24 litigation.

25 2. To allow the parties to draft a final agreement and to obtain approval of
 26 appropriate officials of the United States Department of Justice, the Presidio Trust, the United
 27 States Army, the California Department of Transportation, and the California Transportation
 28 Commission, the parties respectfully request a 120 day stay of this matter.

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3. The Parties hereby consent to entry of the foregoing Stipulation.

Respectfully submitted,

FOR PLAINTIFF THE UNITED STATES OF AMERICA:

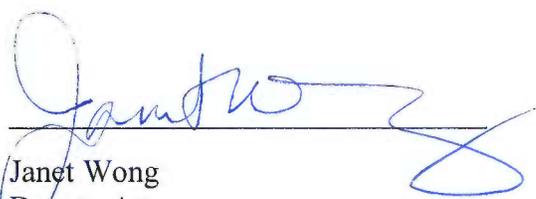
Date: 3/1/11



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FOR DEFENDANT THE CALIFORNIA DEPARTMENT OF TRANSPORTATION:

Date: 3/1/11



Janet Wong
Deputy Attorney
California Department of Transportation
595 Market Street, Suite 1700
San Francisco, CA 94105

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 3/2/11

U.S. DISTRICT

