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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PROGRESSIVE CASUALTY )  
INSURANCE COMPANY, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JACKIE K. DELANEY; LARRY E. )  
CARTER; MARK A. STOUT; )  
KENNETH TEMPLETON; JOHN )  
SHIVELY; STEPHEN C. KALB; )  
JEROME F. SNYDER; HUGH )  
TEMPLETON; and RICK )  
DRESCHLER, )  
 )  
Defendants. )

Case No. 2:11-cv-00678-LRH-PAL  
  
**STIPULATION TO EXTEND  
STAY OF PROCEEDINGS**  
  
**(FOURTH REQUEST)**

1 Pursuant to the Court's January 7, 2015 Order, the parties hereby  
2 submit this status report and further stipulate and request that the Court  
3 stay all deadlines in this case until January 30, 2015, based on the following:

4 1. On November 19, 2014, the parties mediated under the  
5 guidance of mediator Ken Kendrick of Kendrick Conflict Resolution.

6 2. After lengthy negotiations, the parties reached a settlement  
7 in principle.

8 3. While some of the corporate parties got final authority for  
9 the agreement in principle to become a final agreement, the parties filed a  
10 stipulation on November 21, 2014 (#200) to stay all proceedings for ten days.  
11 On November 25, 2014, the Court entered an order to stay proceedings until  
12 December 2, 2014.

13 5. To allow the parties time to prepare the final settlement  
14 agreement and dismissal paperwork, the parties filed a stipulation on  
15 November 26, 2014 (#202) to stay all proceedings until December 29. On  
16 November 28, 2014, the Court entered an order staying proceedings until  
17 December 29, 2014 and ordering the parties to file a status report by January  
18 6, 2015 advising the court when they expect to finalize their settlement and  
19 file a stipulation for dismissal. At the parties' joint request, on December 29,  
20 2015 (#205), the Court further extended the stay until January 16, 2015 to  
21 allow the parties to finalize settlement and dismissal paperwork. On  
22 January 7, 2015 (#207), after the parties filed their joint status report, the  
23 Court ordered the parties to submit a revised status report by January 16,  
24 2015.

25 6. The parties have exchanged draft settlement agreements  
26 and dismissal paperwork, held teleconferences, and are discussing some of  
27 the terms of their agreement. Due to the number of parties involved, the  
28 process has been lengthy but the remaining terms under discussion are

1 limited. The parties are trying to complete the settlement agreement by  
2 January 30, 2015, and will promptly advise the Court if any issues arise.

3 7. The cost of completing the upcoming briefing and  
4 discovery deadlines would undermine the agreed-upon settlement  
5 arrangement because of the financial and time expense involved with  
6 fulfilling those deadlines. Temporarily staying those deadlines would  
7 effectuate the parties' mutual desire to decrease the cost of litigation pending  
8 settlement.

9 The parties submit that good cause exists to stay all proceedings  
10 in this case until January 30, 2015. The parties therefore request that the  
11 Court enter an order granting such a stay and ordering the parties by  
12 January 30, 2015 to file a supplemental status report advising the court when  
13 they expect to finalize their settlement and file a stipulation for dismissal.

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20 Deposit Insurance Company as  
21 Receiver for Sun West Bank

22 **ORDER**

23 IT IS SO ORDERED. All proceedings in this case are stayed until  
24 January 30, 2015 to allow the parties to finalize settlement and dismissal  
25 paperwork. The parties will file a supplemental status report by January 30,  
26 2015 advising the court when they expect to finalize their settlement and file  
27 a stipulation for dismissal.  
28

DATED this 22nd day of January, 2015.

  
\_\_\_\_\_  
LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE