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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ROBERT ANSARA, Special Administrator )  
of the Estate of Travis Curro, )

Case No. 2:18-cv-00658-GMN-PAL

11 Plaintiff, )

**UNOPPOSED MOTION TO STAY  
PROCEEDINGS PENDING  
COMPROMISE SETTLEMENT**

12 v. )

13 UNITED STATES OF AMERICA, *ex rel* )  
14 UNITED STATES POSTAL SERVICE, )

15 Defendant. )

16 Federal Defendant United States of America respectfully requests this Court enter a stay  
17 of all proceedings and deadlines, including all motion and discovery deadlines, until November  
18 19, 2018, in order to allow the parties to finalize the terms of a settlement agreement and to  
19 execute and enter a Stipulation to Dismiss with Prejudice. Plaintiff does not oppose this request.

20 In support of this motion, the United States submits as follows:

21 1. The parties have been engaged in settlement negotiations and have recently  
22 agreed in principal to a compromise settlement which will resolve all outstanding claims  
23 between the parties. Documents supporting this settlement are being prepared and the parties  
24 expect that the matter will be concluded within the next month.

25 2. Courts have broad discretion to stay proceedings for a limited time. *See Landis v.*  
26 *N. Am. Co.*, 299 U.S. 248, 254-55 (1936); *see also Clinton v. Jones*, 520 U.S. 681, 706 (1997)  
27 (courts have broad discretion in the management of cases, including the setting of cases for  
28 trial).

