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EL DORADO CO. SUPERIOR CT.
FILED JAN 25 2021
BY Deputy

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EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT
CODE § 6103

11
12 Attorneys for Respondents and Defendants
EL DORADO COUNTY BOARD OF
13 SUPERVISORS, COUNTY OF EL DORADO

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 IN AND FOR THE COUNTY OF EL DORADO

17 RURAL COMMUNITIES UNITED, an
unincorporated association;
18 CONSERVE EL DORADO OAKS, an
unincorporated association; ELLEN
19 VAN DYKE, an individual; CHERYL
LANGLEY, an individual,

CASE NO. PC20170536

Assigned for all purposes to:
Hon. Dylan M. Sullivan – Dept. 9

STIPULATION AND [PROPOSED] ORDER
FOR PARTIAL STAY OF ENFORCEMENT
OF WRIT OF MANDAMUS

20 Plaintiffs,
21 v.

[CCP § 918]

22 COUNTY OF EL DORADO;
EL DORADO COUNTY BOARD OF
23 SUPERVISORS, and
DOES 1-25.

24 Respondents.
25

1 Peremptory Writ of Mandate issued in the action, including modifying, staying enforcement of, or
2 discharging the Peremptory Writ of Mandate issued in the action.

3 5. Petitioners' agreement to this stipulation and order shall not be construed as a
4 waiver of any objections that Petitioners may have to the County's issuance of any permit .
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6 **[SIGNATURES ON FOLLOWING PAGE]**
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IT IS SO STIPULATED.

LAW OFFICES OF THOMAS N. LIPPE. APC

Dated: 1/20, 2021

By: Tom Lippe
THOMAS N. LIPPE
Attorney for Petitioners
RURAL COMMUNITIES UNITED *et al.*

LAW OFFICES OF MICHAEL W. GRAF

Dated: January 20, 2021

By: Michael W. Graf
MICHAEL W. GRAF
Attorney for Petitioners
RURAL COMMUNITIES UNITED *et al.*

ABBOTT & KINDERMANN, INC.

Dated: Jan 20, 2021

By: William W. Abbott
WILLIAM W. ABBOTT
Attorneys for Respondents
EL DORADO COUNTY BOARD OF
SUPERVISORS, COUNTY OF EL DORADO

IT IS SO ORDERED that the enforcement of the Judgment and Writ is stayed only insofar as to allow the County to approve construction permits which would not result in (a) removal of oak trees or (b) removal or impact to oak woodlands within the area of the mapped Important Biological Corridors ("IBC") running north to south of Highway 50 as depicted on the map attached as Exhibit A to the Writ. The terms "oak woodlands" and "impact to oak woodlands" are defined for the purpose of this Order as they are defined in the Stipulation of the parties set forth above.

Dated: 01/25/21

By: Dylan M. Sullivan
Hon. Dylan M. Sullivan
Judge of the Superior Court
El Dorado County Superior Court

1 **PROOF OF SERVICE**

2 I, Lisa Haddix, declare as follows:

3 I am employed in the County of Sacramento, over the age of eighteen years and not a party to this
4 action. My business address is 2100 21st Street, Sacramento, California 95818. On January 21, 2021, I
served the foregoing document(s) described as:

5 **CORRESPONDENCE TO JUDGE SULLIVAN DATED JANUARY 21, 2021**

6 **STIPULATION AND [PROPOSED] ORDER FOR PARTIAL STAY OF**
7 **ENFORCEMENT OF WRIT OF MANDAMUS**

8 On the parties stated below, by placing a true copy thereof in an envelope addressed as shown
below by the following means of service:

9 Thomas N. Lippe Attorney for Plaintiff Rural Communities United
10 LAW OFFICES OF THOMAS N. LIPPE, APC
201 Mission Street, 12th Floor
11 San Francisco, CA 94105
Tel: (415) 777-5604
12 Fax: (415) 777-5606
Email: Lippelaw@sonic.net

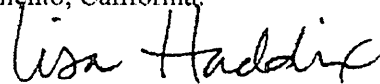
13 Michael W. Graf Attorney for Plaintiff Rural Communities United
14 LAW OFFICES
227 Behrens Street
15 El Cerrito, CA 94530
Tel/Fax: (510) 525-1208
16 Email: mwgraf@aol.com

17 **BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated above on the above-
18 mentioned date. I am familiar with the firm's practice of collection and processing
19 correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the
ordinary course of business. I am aware that on motion of party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after the date of
deposit for mailing in affidavit.

20 **X BY ELECTRONIC SERVICE [EMAIL]:** Sending a true copy of the above-described
21 document(s) via electronic transmission from email address lhaddix@aklandlaw.com to the
22 persons listed above on January 21, 2021, before 5:00 p.m. The transmission was reported as
complete and without error. [CRC 2.256 (a)(4), 2.260].

23 **BY OVERNIGHT DELIVERY:** On the above-mentioned date, I enclosed the documents in a
24 sealed envelope and addressed to the persons listed on the attached service list. I placed the
envelope or package for collection with the USPS with overnight delivery instructions following
our ordinary business practices.

25 I declare, under penalty of perjury under the laws of the State of California, that the foregoing is
26 true and correct. Executed on January 21, 2021, at Sacramento, California.

27 

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Lisa Haddix