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9 UNITED STATES BANKRUPTCY COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION
12

13 In re:
14 CITY OF STOCKTON, CALIFORNIA,
15 Debtor.

Case No. 2012-32118

Chapter 9

**STIPULATION BETWEEN THE CITY
OF STOCKTON AND THE COUNTY
OF SAN JOAQUIN RE EXTENDING
THE DEADLINE SET BY
BANKRUPTCY CODE § 546(a)(1);
ORDER APPROVING STIPULATION**

[No Hearing Required]

20 The City of Stockton (the “City”) and the County of San Joaquin (the “County” and,
21 together with the City, the “Parties”) hereby enter into the following stipulation:

22 **RECITALS**

23 1. The City filed a voluntary petition initiating this chapter 9 case on June 28, 2012.
24 The order for relief was filed on April 1, 2013 [Dkt. No. 844]. The City’s plan of adjustment was
25 confirmed by an order filed on February 4, 2015, and went effective on February 25, 2015 [Dkt.
26 Nos. 1875 and 1915, respectively].

27 2. On March 12, 2015, the County filed two proofs of claim (Nos. 280 and 281)
28 (together, the “Proofs of Claim”) and a pleading entitled Reservation of Rights by County of San

RECEIVED

March 24, 2015

CLERK, U. S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
0005479131

STIPULATION AND ORDER EXTENDING
THE SECTION 546(a)(1) DEADLINE

1 Joaquin in Response to Notice of Rejection of Executory Contract; Notice of Potential Claims
2 [Dkt. No. 1921] (the “Reservation of Rights” and, together with the Proofs of Claim, the “County
3 Claims”).

4 3. The City has represented to the County that it intends to file an avoidance action
5 in response to the County Claims if certain disputes between the City and the County cannot be
6 resolved consensually.

7 4. In light of the April 1, 2013, date of the order for relief, the deadline under
8 Bankruptcy Code § 546(a)(1) for filing avoidance actions is on or about March 31, 2015.

9 5. The Parties have agreed to extend the § 546(a)(1) deadline by 90 days from March
10 31, 2015, to and including June 29, 2015, in order to provide them the opportunity to resolve their
11 disputes without the cost of litigation.

12 Accordingly, the Parties hereby stipulate and agree as follows:

13 **STIPULATION**

14 1. The deadline imposed by Bankruptcy Code § 546(a)(1) for the City to file an
15 avoidance action against the County is extended to and including June 29, 2015.

16 Dated: March 24, 2015

Orrick, Herrington & Sutcliffe LLP

17
18 By: /s/ Marc A. Levinson
19 Marc A. Levinson
20 Attorneys for Debtor
21 City of Stockton

22 Dated: March 24, 2015

Downey Brand LLP

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24 By: /s/ Jamie Dreher
25 Jamie Dreher
26 Attorneys for County of San Joaquin
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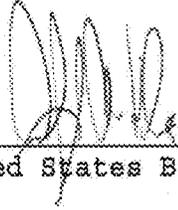
ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES,

IT IS HEREBY ORDERED that the foregoing Stipulation Between The City Of Stockton
And The County Of San Joaquin Re Extending The Deadline Set By Bankruptcy Code §
546(a)(1), and

IT IS FURTHER ORDERED that the deadline imposed by Bankruptcy Code § 546(a)(1)
for the City to file an avoidance action against the County is extended to and including June 29,
2015.

Dated: March 25, 2015



United States Bankruptcy Judge