

1 DAVID A. DIEPENBROCK (SBN 215679)  
ROBERTO G. CRUZ (SBN 342729)  
2 **weintraub tobin** chediak coleman grodin  
LAW CORPORATION  
3 400 Capitol Mall, 11th Floor  
4 Sacramento, California 95814  
Telephone: 916.558.6000  
5 Facsimile: 916.446.1611  
Email: [ddiepenbrock@weintraub.com](mailto:ddiepenbrock@weintraub.com)  
6 [rcruz@weintraub.com](mailto:rcruz@weintraub.com)

7 Attorneys for Plaintiffs,  
8 SIERRA NORTHERN RAILWAY and MENDOCINO RAILWAY

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 SIERRA NORTHERN RAILWAY, a  
California corporation, and MENDOCINO  
13 RAILWAY, a California corporation,

14 Plaintiffs,

15 vs.

16 CITY OF FORT BRAGG, and DOES 1  
17 through 25, inclusive,

18 Defendants.  
19

Case No.: 24-cv-04810-JST

**STIPULATION AND ORDER TO  
CONTINUE INITIAL CASE  
MANAGEMENT CONFERENCE**

weintraub tobin chediak coleman grodin  
law corporation

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs SIERRA  
2 NORTHERN RAILWAY and MENDOCINO RAILWAY, on the one hand, and Defendant CITY  
3 OF FORT BRAGG on the other, by and through their undersigned counsel, as follows:

4 **WHEREAS** the parties stipulated and the Court granted leave for Plaintiffs to file an  
5 Amended Complaint in this matter by no later than November 1, 2024.

6 **WHEREAS** Mendocino Railway is currently adverse to the City of Fort Bragg in *City of Fort*  
7 *Bragg v. Mendocino Railway*, Mendocino County Superior Court, Case No. 21CV00850, among  
8 other proceedings.

9 **WHEREAS** Plaintiffs and the City have been engaged in party-to-party settlement  
10 discussions regarding all legal actions presently pending between them.

11 **WHEREAS** on October 28, 2024, the City authorized its counsel of record to seek a 90-day  
12 stay of litigation between it and either of the Plaintiffs in order to facilitate further party-to-party  
13 settlement discussions.

14 **WHEREAS** the Initial Case Management Conference is currently scheduled for November  
15 5, 2024.

16 **WHEREAS** the interests of judicial economy and efficiency support continuing the Initial  
17 Case Management Conference.

18 **NOW, THEREFORE**, pursuant to the foregoing, Plaintiffs and Defendants, by and through  
19 their counsel, stipulate and agree that the Initial Case Management Conference to on or after March  
20 30, 2025.

21 SO STIPULATED.  
22  
23  
24  
25  
26  
27  
28

weintraub tobias chediak coleman grodin  
law corporation

1 Dated: October 30, 2024

**weintraub tobin** chediak coleman grodin  
LAW CORPORATION

2

3

By: /s/ David A. Diepenbrock  
David A. Diepenbrock  
Attorneys for Plaintiff  
Sierra Northern Railway

4

5

6

7 DATED: October 30, 2024

JONES MAYER

8

9

By: /s/ Krista MacNevin Jee as authorized on 10/29/24  
Krista MacNevin Jee  
Attorneys for Defendant  
CITY OF FORT BRAGG

10

11

12

13 **IT IS SO ORDERED.**

14

15 Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
HON. JON S. TIGAR  
JUDGE OF THE NORTHERN DISTRICT OF THE  
UNITED STATES DISTRICT COURT

16

17

18

19

20

21

22

23

24

25

26

27

28

weintraub tobin chediak coleman grodin  
law corporation