Richard J. Reynolds (SBN 89911)
E-mail: rreynolds@bwslaw.com
Joseph P. Buchman (SBN 148983)
E-mail: jbuchman@bwslaw.com
Martin Kosla (SBN 247224)
E-mail: mkosla@bwslaw.com
BURKE, WILLIAMS & SORENSEN, LLP
444 South Flower Street, 40th Floor
Los Angeles, California 90071-2942
Tel: 213.236.0600 Fax: 213.236.2700

Attorneys for Diablo Grande Community Facilities District No. 1

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

In re DIABLO GRANDE COMMUNITY FACILITIES DISTRICT NO. 1, Debtor.	Case No. 25-26635-A-9 DCN RPL-1 **STIPULATION FOR ORDER REVISING DISCOVERY DEADLINES IN CONTESTED MATTER** Date: July 29, 2026 Time: 9:30 a.m. Ctrm: Dept. A, Ctrm 11 2500 Tulare Street, Fresno California

Diablo Grande Community Facilities District No. 1 (the "Debtor"), and the County of Stanislaus, California (the "County")(collectively, the "Parties") hereby stipulate to the following:

1. On April 3, 2026, the County filed an Objection to the Chapter 9 Petition (the "Objection") [Dkt. 43]. No other creditor or interested party filed an objection.

2. On April 16, 2026, the Court entered its Scheduling Order [Dkt. 63], setting dates in the Contested Matter arising from the County's Objection (RPL-1). As of this date, the Debtor and the County have exchanged their initial disclosures, as well as, some written discovery. Depositions have been noticed for the last week in July.

3. The Parties are currently engaged in settlement negotiations to resolve the County's Objection and the Parties request a brief extension of the remaining discovery deadlines in the Contested Matter so that they may conduct their settlement discussions without the need to incur

additional attorney's fees and costs in discovery efforts which may prove unnecessary.

Therefore, the Parties request that the Court order the following changes to the discovery deadlines in the Court's April 16, 2026 Scheduling Order [Dkt. 63]:

Close of fact discovery:	August 31, 2026
Designation of experts and deadline for expert reports	September 28, 2026
Designation of rebuttal experts and deadline for rebuttal expert reports	October 23, 2026
Close of expert discovery:	November 13, 2026
Joint status report:	November 20, 2026 (no change)
Evidentiary Hearing Setting Conference	December 2, 2026 at 9:30 a.m. (no change)

A proposed order is submitted concurrently for the Court's use in the form attached hereto as Exhibit A. This Stipulation proposes a hearing on July 29, 2026 at 9:30 a.m. should the Court wish the Parties' attorneys to address this Stipulation. However, if the Court is amenable, the Parties prefer entry of the proposed order without a hearing.

Dated: July 16, 2026

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Joseph P. Buchman
Richard J. Reynolds
Joseph P. Buchman
Martin Kosla
Attorneys for Diablo Grande Community Facilities District No. 1

Dated: July 16, 2026

RENNE PUBLIC LAW GROUP

By:
Rubin E. Cruse, Jr.
Mauricio A. Grande
Attorneys for County of Stanislaus, California