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COUNTY OF STANISLAUS, through
The Board of Supervisors and
The County Treasurer-Tax Collector

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

In re DIABLO GRANDE COMMUNITY FACILITIES DISTRICT NO. 1, Debtor.	Case No. 25-26635-A-9 DCN RPL-1 **STIPULATION FOR ORDER SHORTENING TIME TO FILE COUNTY OF STANISLAUS'S MOTION FOR PROTECTIVE ORDER** Date: August 6, 2026 Time: 11:00 a.m. Ctrm: Dept. A, Ctrm 11 2500 Tulare Street, Fresno, California Ch. 9 Petition Filed: November 25, 2025 Evid. Hrg. Setting Conf.: December 2, 2026

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Secured Creditor County of Stanislaus, through the Board of Supervisors and the County Treasurer-Tax Collector (the "County") and Debtor Diablo Grande Community Facilities District No. 1 (the "CFD") (collectively, the "Parties"), through their respective counsel, hereby stipulate and agree as follows:

1. On June 29, 2026, the CFD served a notice of depositions (the "Deposition Notice"), naming the following County officials as witnesses for deposition between July 29-31, 2026: (i) Donna Riley, the County Treasurer-Tax Collector; (ii) Thomas Boze, County Counsel; (iii) Supervisor Matthew "Buck" Condit of the County Board of Supervisors; (iv) Supervisor Vito Chiesa of the County Board of Supervisors; (v) Supervisor Terry Withrow of the County Board of Supervisors; (vi) Supervisor Mani Grewal of the County Board of Supervisors; (vii) Supervisor Channce Condit of the County Board of Supervisors; and (viii) Erik Klevmyr, County Fire Warden.

2. On July 2, 2026, the County served its objections to the Deposition Notice and invited the CFD to meet and confer regarding the depositions of high-ranking County officials.

3. On July 16, 2026, the Parties met and conferred and agreed to continue the depositions to late August 2026.

4. On July 27, 2026, the Parties again met and conferred regarding the Deposition Notice. The County reiterated its objections to the depositions of the County Counsel, the County Board of Supervisors, and the County Fire Warden and indicated it would file a motion for a protective order (the "Protective Order Motion") for hearing on August 27, 2026 at 11:00 a.m., an available date on the Court's self-set hearing calendar for motions in adversary proceedings. The County also noted that it would not seek a protective order for the deposition of the County Treasurer-Tax Collector. The CFD proposed serving additional discovery requests to determine whether the depositions of the remaining County officials would be necessary, and it proposed stipulating to an order shortening time for the County to file the Protective Order Motion. Pursuant to Local Rule 9014-1(f)(1) and (2) of the Bankruptcy Local Rules, the County's motion would normally be set on 28 days' notice.

5. On July 28, 2026, the Parties again met and conferred and agreed to the stipulation.

6. The Parties are currently engaged in settlement negotiations to resolve the County's Objection to the CFD's Chapter 9 Petition and the Parties request an order shortening time for the County

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to file the Protective Order Motion so that they may continue to conduct their settlement discussions without the further need to incur additional attorney's fees and costs in discovery efforts which may prove unnecessary.

Therefore, the Parties stipulate that the County may set the Protective Order Motion on 21 days' notice with the following filing and briefing schedule:

Motion Filing Deadline:	August 6, 2026
CFD's Opposition Deadline:	August 13, 2026
County's Reply Deadline:	August 20, 2026
Motion Hearing Date:	August 27, 2026

The Parties further stipulate that the dates for the depositions of the County Counsel, the County Board of Supervisors, and the County Fire Warden, should they proceed, shall be set for August 31, 2026, after the hearing on the County's Protective Order Motion on August 27, 2026.

A proposed order is submitted concurrently for the Court's use. This Stipulation proposes a hearing date on August 6, 2026 at 11:00 a.m. should the Court wish the Parties' counsel to address this Stipulation. However, if the Court is amenable, the Parties prefer entry of the proposed order without a hearing.

Dated: July 30, 2026

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By: _____
RUBIN E. CRUSE, JR.
MAURICIO A. GRANDE

Attorneys for Secured Creditor
COUNTY OF STANISLAUS, through
The Board of Supervisors and
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Dated: July 30, 2026

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