

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PUBLIC EMPLOYEES FOR)
ENVIRONMENTAL RESPONSIBILITY)

Plaintiff,)

v.)

UNITED STATES NUCLEAR)
REGULATORY COMMISSION)

Defendant.)

Case no.: 13-1248 (JDB)

JOINT MOTION TO STAY

The Parties hereby move for a twelve day stay of all proceedings to allow the Parties to finalize settlement in this case. There is good cause for this motion. Since the Parties last requested a sixty-day stay to pursue settlement, they have made significant progress. The Parties have reached an agreement to settle this case in principle and are just awaiting final approval. Once final approval is received, the Parties anticipate executing the final notice of settlement and stipulation of dismissal. The Parties believe that a short stay will accommodate the time needed to receive final approval.

Wherefore, the Parties move that all proceedings be stayed for twelve days, until November 27, 2013.

Dated: November 15, 2013

Respectfully submitted,

/s/ Kathryn Douglass

Kathryn Douglass, DC # 995841
Public Employees for

RONALD C. MACHEN JR.,
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