

DISTRICT COURT, DOUGLAS COUNTY, COLORADO 4000 Justice Way Castle Rock, CO 80109	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
IN RE THE MATTER OF VILLAGES AT CASTLE ROCK METROPOLITAN DISTRICT #9	
<p> JOHN W. SUTHERS, Attorney General Leeann Morrill, First Assistant Attorney General* Email: leeann.morrill@state.co.us Attorney Reg. No. 38742 Maurice G. Knaizer, Senior Assistant Attorney General* Email: maurice.knaizer@state.co.us Attorney Reg. No. 5264 1300 Broadway, 6th floor Denver, CO 80203 Telephone: 720-508-6000 *Counsel of Record <i>Attorneys for the Division of Local Government of the Colorado Department of Local Affairs</i> </p> <p> Brian A. Magoon, No. 9072 Jena R. Akin, No. 45117 Robinson Waters & O'Dorisio, P.C. 1099 18th Street, Suite 2600 Denver, CO 80202-1926 T: 303-297-2600 F: 303-297-2750 E: bmagoon@rwolaw.com; jakin@rwolaw.com <i>Counsel for The Villages at Castle Rock Metropolitan District No. 4</i> </p>	Case No. 1985 CV 306
<p style="text-align: center;">STIPULATED MOTION TO STAY</p>	

The Villages at Castle Rock Metropolitan District No. 4 ("District 4") and the Division of Local Government (the "Division") of the Colorado Department of Local Affairs, by and through their undersigned counsel, hereby file this Stipulated Motion to Stay, and in support thereof state as follows:

1. On January 23, 2014, District 4 filed a Complaint for Declaratory Relief in the District Court of the City and County of Denver, seeking a judicial determination and declaration that (a) District 9 has financial obligations to District 4; (b) as such, a condition precedent to the issuance of a Declaration of Dissolution has not been satisfied; (c) as such, the Declaration of Dissolution issued on August 26, 2013 is null and void; and (d) the Declaration of Dissolution impairs the obligations of contract between District 4 and District 9.

2. The Division filed a Petition for Order and Certification of Dissolution of Special District on January 24, 2014 (the "Petition"), seeking an order of dissolution of the Villages at Castle Rock Metropolitan District No. 9 ("District 9").

3. District 4 filed an Unopposed Motion to Intervene and a Response in Opposition to the Petition for Order and Certification of Dissolution of Special District and Request for Stay or, Alternatively, an Evidentiary Hearing, which was attached as Exhibit 2 to the Unopposed Motion to Intervene.

4. C.R.S. § 32-1-710(3) provides, in part:

The Court shall make a determination on the division's declaration within thirty days after the declaration has been submitted

5. District 4 and the Division stipulate to an Order staying this action pending a final determination in Denver District Court as to whether District 9 has outstanding financial obligations owed to District 4.

WHEREFORE, District 4 and the Division seek an Order staying this action pending a final resolution of the Complaint for Declaratory Relief in Denver District Court.

Respectfully submitted this 3rd day of February, 2014.

Robinson Waters & O'Dorisio, P.C.

John W. Suthers, Attorney General

/s/ Brian A. Magoon

Brian A. Magoon, No. 9072

Jena R. Akin, No. 45117

Counsel for Plaintiff

(Original signature on file at Robinson Waters & O'Dorisio, P.C.)

/s/ Maurice G. Knaizer

Leeann Morrill, *38742

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Public Officials Unit

State Services Section

Attorneys for the Division of Local

Government of the Colorado Department of

Local Affairs

***Counsel of Record**

(Original signature on file at the Attorney General's Office)

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2014, I electronically filed and served the foregoing via ICCES and/or placed a true and correct copy of the foregoing in the U.S. Mail, first-class postage thereon prepaid, addressed to the following:

Douglas County Board of County Commissioners
100 Third Street
Castle Rock, CO 80104

Douglas County Assessor
301 Wilcox Street
Castle Rock, CO 80104

Douglas County Clerk & Recorder
301 Wilcox Street
Castle Rock, CO 80104

Town of Castle Rock
100 North Wilcox Street
Castle Rock, CO 80104

/s/ Donna C. Steir