

STATE OF WISCONSIN   CIRCUIT COURT SHEBOYGAN COUNTY  
BRANCH 3

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TRAVIS KOBS,

Plaintiff,

v.

Case No. 24-CV-000315

Steven Little, in his official  
capacity as Acting Secretary of the Department of  
Nature Resources,

Defendant.

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**STIPULATION & JOINT MOTION FOR A STAY**

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IT IS HEREBY AGREED AND STIPULATED, by and between the parties,  
through their undersigned counsel, that:

1.     Acting Secretary Steven Little has notified the Plaintiff that he intends to repeal Wis. Admin. Code § NR 20.05(2) as soon as practicable and without delay. He hopes to successfully effect the repeal through the expedited repeal process. However, should that process fail for any reason, he commits to pursuing the repeal through the full, formal repeal process.

2.     In exchange, Travis Kobs agrees to dismiss his complaint upon the completion of the repeal process set forth in paragraph 1. Mr. Kobs will notify this Court within two business days of the repeal and file a voluntary dismissal within five business days of the repeal.

3. In consideration for the above, the Parties agree that this Court should enter an order staying all proceedings, including the Defendant's answer deadline, until January 1, 2025. The Parties may stipulate to an extension of this stay if necessary to allow the Defendant additional time to complete the repeal process set forth in paragraph 1.

WHEREFORE, in light of the foregoing and in the interest of judicial efficiency, THE PARTIES JOINTLY MOVE for this Court to stay this action until January 1, 2025. If the stay is not further extended, the Parties stipulate that Acting Secretary Little's answer would be due within five business days after the expiration of the stay.

DATED July 22, 2024.

Respectfully submitted,

WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

*Electronically Signed by Skylar Croy*

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