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March 12, 2007

*ALASKA BAR

Candida S. Steel
Administrative Judge
Civilian Board of Contract Appeals
1800 M Street, N.W., 6th Floor
Washington, DC 20036

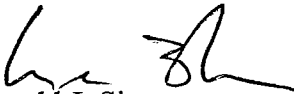
Re: Appeal of the Southcentral Foundation
CBCA 542-ISDA; Formerly IBCA Nos. 4864
through 4870/06

Dear Judge Steel:

I enclose for filing an original and one copy of the parties' Joint Motion to Stay Proceedings and accompanying proposed order. Additionally we are enclosing one extra copy of the Motion so that it can be conformed and returned to us.

Sincerely,

SONOSKY, CHAMBERS, SACHSE,
ENDRESON & PERRY, LLP


Donald J. Simon
Lloyd Benton Miller
Melanie Baca Osborne

cc: Michelle D. Johnson-Webb, Esq. (w/ enclosures)

Enclosures: Joint Motion to Stay Proceedings
w/ proposed order (original plus 2)

CIVILIAN BOARD OF CONTRACT APPEALS

SOUTHCENTRAL FOUNDATION,)	
)	
Appellant,)	
)	
vs.)	CBCA 542-ISDA
)	
MICHAEL O. LEAVITT, SECRETARY)	(Formerly IBCA Nos.
U.S. DEPARTMENT OF HEALTH AND)	4864 through 4870/06)
HUMAN SERVICES, <i>et al.</i> ,)	
)	
Appellees.)	
)	

JOINT MOTION TO STAY PROCEEDINGS

Appellant Southcentral Foundation, and Appellees Michael O. Leavitt, Secretary, United States Department of Health and Human Services; Charles Grim, Director, Indian Health Service; and the United States of America, by their undersigned counsel, move to stay all proceedings in this appeal until May 31, 2007. In support of this motion, the parties show as follows:

1. Appellant's Complaint was received by the Board of Contract Appeals on December 27, 2006. In its Complaint, Appellant asserted that Appellees are liable for money damages due to the failure to recognize properly and to pay annually in full various "contract support costs" for contracts entered into between Appellant and Appellees under the Indian Self-Determination and Education Assistance Act, 25 U.S.C. §§ 450-458aaa-18 et seq.

2. Appellant and Appellees anticipate that some of the legal issues involved in this appeal are a part of several other appeals pending before the Civilian Board of Contract Appeals ("CBCA"), including Arctic Slope Native Association, Ltd. v. Leavitt, et al., IBCA Nos. 4794-2006 through 4803-2006 (ASNA"), Metlakatla Indian Community v. IHS, CBCA Nos. 181-

ISDA, 279-ISDA THROUGH 282-isda ("Metlakatla"), and Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians v. IHS, IBCA Nos. 4724-2005 through 4727-2005 ("Coos").

The parties in the ASNA, Metlakatla and Coos appeals have concluded briefing on several motions, including motions to dismiss. The parties in the ASNA appeal held arguments on February 28, 2007. The Metlakatla oral argument is scheduled for March 15, 2007 and the Coos oral argument is scheduled for March 22, 2007. The parties expect that a decision will be issued by the CBCA shortly thereafter. The dispositions of the motions in these cases will likely assist the parties in addressing any similar legal issues in this appeal.

3. Given the proceedings in the above-referenced cases, the parties agree that the most efficient course of action is to stay this appeal until May 31, 2007, reserving to either party the right to request that the stay be lifted prior thereto for good cause shown.

4. The parties agree that this Motion to Stay Proceedings does not prejudice either party to file dispositive motions in the future.

For the foregoing reasons, the parties respectfully request that this Motion to Stay Proceedings be granted.

Respectfully submitted this 12 day of March 2007.

Attorneys for Appellant

SONOSKY, CHAMBERS, SACHSE,
MILLER & MUNSON, LLP

Dated: 3/12/07

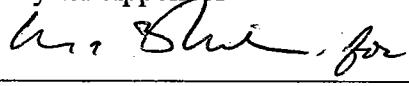
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Dated: 3/12/07

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CIVILIAN BOARD OF CONTRACT APPEALS

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)	
Appellees.)	
)	

ORDER GRANTING MOTION TO STAY PROCEEDINGS

The parties' Motion to Stay Proceedings is hereby GRANTED. The appeal is stayed until May 31, 2007, and either party may move that the suspension be lifted prior thereto for good cause shown.

SO ORDERED this ___ day of _____, 2007.

Candida Steel
Administrative Judge