

1 SEYFARTH SHAW LLP
G. Daniel Newland (SBN 087965) dnewland@seyfarth.com
2 Cassandra H. Carroll (SBN 209123) ccarroll@seyfarth.com
Eric M. Lloyd (SBN 254390) elloyd@seyfarth.com
3 Matthew J. Mason (SBN 271344) mmason@seyfarth.com
560 Mission Street, Suite 3100
4 San Francisco, California 94105
Telephone: (415) 397-2823
5 Facsimile: (415) 397-8549

6 Attorneys for Defendants/Counter-Claimants
VALLEY MOUNTAIN REGIONAL CENTER,
7 RICHARD JACOBS, and TARA SISEMORE-HESTER

8 KRONICK MOSKOVITZ TIDEMANN & GIRARD
Michelle L. Cannon (SBN 172680) mcannon@kmtg.com
9 2390 Professional Drive
Roseville, CA 95661
10 (916) 321-4500
(916) 321-4555

11 Attorneys for Modesto City Schools, Modesto City Schools Board of Education, Virginia
12 Johnson and Sue Swartzlander

13 MCARTHUR & LEVIN, LLP
Rodney L. Levin (SBN 169360) rod@mcarthurlevin.com
14 637 Santa Cruz Avenue
Los Gatos, CA 95030
15 (408) 741-2377
(408) 741-2378

16 Attorneys for Ripon Unified School District, Ripon Unified School District Board of Trustees
and San Joaquin County Office of Education

17 LOUGHREY & ASSOCIATES
18 Tamara L. Loughrey (SBN 227001) tamara@spedattorneys.com
Loughrey & Associates
19 Lawyers & Advocates for Disability Rights, Inc.
21 - C Orinda Way, #307
20 Orinda, CA 94563
(925) 253-1693
21 (925) 253-9693 (facsimile)
Attorneys for Plaintiffs and Counter Defendants

22 LEIGH LAW GROUP
23 Mandy Leigh (SBN 225748) mleigh@leighlawgroup.com
Jay T. Jambeck (SBN 226018) jjambeck@leighlawgroup.com
24 870 Market St Ste 1157
San Francisco, CA 94102
25 (415) 399-9155
(415) 795-3733 (facsimile)
26 Attorneys for Plaintiffs and Counter Defendants

27 THE UNITED STATES DISTRICT COURT FOR
28 THE EASTERN DISTRICT OF CALIFORNIA

1 Z.F, a minor, by and through his parents M.A.F.)
and J.F. and M.A.F. and J.F individually; L.H.)
2 and J.H., minors, by and through their parents)
J.A. and J.R.H. and J.A. and J.R.H. individually;))
3 A.N., a minor, by and through his parents, G.N.)
and M.R., and G.N. and M.R. individually,)

Case No. 2:10-CV-00523 GEB-JFM

**REQUEST AND JOINT STIPULATION
TO CONTINUE CLASS
CERTIFICATION DEADLINES;
[PROPOSED] ORDER**

4)
5 Plaintiffs, on behalf of)
themselves and all others)
6 similarly situated)

7 vs.)

8 RIPON UNIFIED SCHOOL DISTRICT,)
(RUSD); RIPON UNIFIED SCHOOL)
9 DISTRICT BOARD OF TRUSTEES,; SAN)
JOAQUIN COUNTY OFFICE OF)
EDUCATION; VALLEY MOUNTAIN)
10 REGIONAL CENTER (VMRC), MODESTO)
CITY SCHOOLS, MODESTO CITY)
11 SCHOOLS BOARD OF EDUCATION,)
RICHARD JACOBS, Executive Director of)
12 VMRC, in his official and individual capacity,)
TARA SISEMORE-HESTER, Coordinator for)
13 Autism Services for VMRC, in her official and)
individual capacity; VIRGINIA JOHNSON,)
14 Director of Modesto City Schools SELPA, in)
her official and individual capacity; SUE)
15 SWARTZLANDER, Program Director for)
Modesto City Schools, in her official and)
16 individual capacity and Does 1-200.)

17 Defendants.)
18)

19 The parties in the above-captioned case hereby stipulate to continue certain deadlines for
20 Plaintiffs' Motion for Class Certification. The reason for this stipulation and request is due to
21 unanticipated issues that have arisen in connection with the scheduling of depositions for certain
22 Plaintiffs that could not have been avoided despite the parties' diligence. Accordingly, the
23 parties have agreed to the following schedule for the pending motions:

24 1. Defendants' Responses/Oppositions to the Plaintiffs' Motion for Class
25 Certification will be due on August 16, 2012.

26 2. Plaintiffs' Reply will be due on August 30, 2012.

27 Presently, Plaintiffs' Motion for Class Certification is set to be heard before this Court on
28 September 10, 2012 at 9:00 a.m. However, the parties are amenable to a hearing continuance, in
the event the Court's calendar so requires.

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IT IS SO STIPULATED.

DATED: June ____, 2012

SEYFARTH SHAW LLP

By: _____
s/s
Cassandra H. Carroll
Attorneys for Defendant
VALLEY MOUNTAIN REGIONAL
CENTER

DATED: June ____, 2012

KRONICK MOSKOVITZ TIDEMANN &
GIRARD

By: _____
s/s
Michelle Cannon
Attorneys for Defendants Modesto City
Schools, Modesto City Schools Board of
Education, Virginia Johnson and Sue
Swartzlander

DATED: June ____, 2012

MCARTHUR & LEVIN, LLP

By: _____
s/s
Rodney L. Levin
Attorneys for Defendants Ripon Unified
School District, Ripon Unified School District
Board of Trustees and San Joaquin County
Office of Education

DATED: June ____, 2012

LOUGHREY & ASSOCIATES

By: _____
s/s
Tamara L. Loughrey
Attorneys for Plaintiffs

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DATED: June ____, 2012

LEIGH LAW GROUP

By: _____ s/s
Mandy Leigh
Jay Jambeck
Attorneys for Plaintiffs

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ORDER

Based on the parties stipulation,

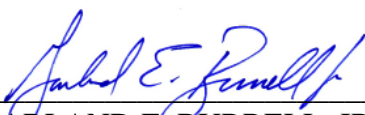
1. Defendants' Responses/Oppositions to Plaintiffs' Motion for Class Certification will now be due on August 16, 2012.

2. Plaintiffs' Reply will be due on August 30, 2012.

3. Oral argument is scheduled to commence at 9:00 a.m. on September 10, 2012.

It is so ordered.

Date: 7/2/2012



GARLAND E. BURRELL, JR.
United States District Judge

14603754v.1