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8 Attorneys for Plaintiffs
 9 JERALD CLINTON (J.C.) EAGLESMITH,
 10 RAMONA EAGLESMITH,
 11 EILEEN COX, and BRUCE BARNES

12 IN THE UNITED STATES DISTRICT COURT
 13 FOR THE EASTERN DISTRICT OF CALIFORNIA

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| 12 | JERALD CLINTON (J.C.) EAGLESMITH,) | Case No. 2:11-CV-00098-JAM-JFM |
| 13 | RAMONA EAGLESMITH, EILEEN COX,) | |
| 14 | and BRUCE BARNES,) | STIPULATION AND ORDER TO TAKE |
| 15 | Plaintiffs,) | THE DEPOSITION |
| 16 | vs.) | ON JIM LAKE ON JUNE 7, OR JUNE 11, |
| 17 | JEFF RAY, as an individual, SUE) | 2012 |
| 18 | SEGURA, as an individual, and BOARD) | |
| 19 | OF TRUSTEES OF PLUMAS COUNTY) | |
| 20 | OFFICE OF EDUCATION/ PLUMAS) | |
| | COUNTY UNIFIED SCHOOL DISTRICT,) | |
| | Defendants.) | |

21 Plaintiffs J.C. Eaglesmith, Ramona Eaglesmith, Bruce Barnes and Eileen Cox,
 22 and defendants Plumas County Office of Education/ Plumas Unified School District, Sue
 23 Segura, and Jeff Ray, by and through their attorneys of record, hereby stipulate as
 24 follows:
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- 26 1. On May 22, 2012, the Court issued an Order (Dkt. No. 103) allowing plaintiffs
 27 to take the deposition of Jim Lake, Principal at Greenville Junior/ Senior High
 28 School in Plumas County Unified School District, and that they be allowed to
 take his deposition in lieu of the deposition of Brad Baker. The parties had

1 scheduled the deposition of Mr. Baker for Thursday, May 31, 2012 in
2 Sacramento, California at 1:00 PM.

3 2. On Tuesday, May 29, 2012, defendants' counsel communicated to plaintiffs'
4 counsel Mr. Lake's proposal that, for his convenience, his deposition be
5 scheduled to either June 7 at 1:00 PM or June 11 at 10:00 AM or later in
6 Sacramento. On May 30, 2012, defendants' counsel wrote to plaintiffs'
7 counsel that Mr. Lake is unavailable on May 31, 2012.
8

9 3. The Court's Status (Pre-trial Scheduling) Order (Dkt. No. 19) states "all
10 discovery shall be completed by June 1, 2012. In this context, 'completed'
11 means that all discovery shall have been conducted so that all depositions
12 have been taken ..."
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14 4. The parties agree to schedule the deposition of Mr. Lake on either of the two
15 dates proposed by Mr. Lake.

16 5. The parties agree to waive the discovery cut-off as it pertains only to this
17 deposition for the purpose of the convenience of Mr. Lake. The cut-off would
18 be waived for no other purpose.
19

20 Dated: May 30, 2012

SIEGEL & YEE

21 By: /s/ Peter Haberfeld
22 Peter Haberfeld

23 Attorneys for Plaintiffs
24

25 Dated: May 30, 2012

STUBBS & LEONE

26 By: /s/ Brian Duus
27 Brian Duus

28 Attorneys for Defendants

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IT IS SO ORDERED

Dated: June 1, 2012

/s/ John A. Mendez
U. S. District Court Judge