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9 Attorneys for Plaintiffs
 10 MORGAN HILL CONCERNED PARENTS ASSOCIATION and
 11 CONCERNED PARENTS ASSOCIATION

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA
 14 SACRAMENTO DIVISION

15 MORGAN HILL CONCERNED PARENTS
 16 ASSOCIATION, an unincorporated
 17 association, and CONCERNED PARENTS
 18 ASSOCIATION, an unincorporated
 19 association,
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 21 Plaintiffs,
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 23 v.
 24 CALIFORNIA DEPARTMENT OF
 25 EDUCATION, and DOES 1 through 5,
 26
 27 Defendants.

28 CASE NO. 2:11-CV-03471-KJM AC
DISCOVERY MATTER
**PLAINTIFFS' AND DEFENDANT'S
 STIPULATION AND [PROPOSED] ORDER RE
 FORMAT OF DISCOVERY MOTION
 PRACTICE**
 Courtroom: 26
 Judge: Honorable Allison Claire
 Magistrate Judge
 Hearing Date: July 18, 2018
 Hearing Time: 10:00 a.m.
 Action Filed: April 23, 2012

29 WHEREAS Defendant California Department of Education (CDE) presently has two
 30 motions pending for hearing on July 18, 2018 before Magistrate Judge Claire in Courtroom 26 at
 31 10 a.m., namely, a motion for sanctions and a motion for a protective order;

32 WHEREAS Plaintiffs Morgan Hill Concerned Parents Association and Concerned Parents
 33 Association (Plaintiffs) anticipate filing three discovery motions to be heard on the same date and
 34 time before Magistrate Judge Claire: a motion for a protective order, and two motions to compel;

35 WHEREAS Magistrate Judge Claire has, in the past, directed the parties to notice all of
 36 their discovery motions pursuant to Local Rule 230, rather than following the procedures set out in

1 Local Rule 251 which ostensibly governs all discovery motions, noting the parties' persistent
2 inability to reach common ground;

3 WHEREAS Local Rule 230 contemplates a more traditional motion practice in which: the
4 moving party files a notice of motion and supporting memorandum of points and authorities; the
5 opposing party files a memorandum of points and authorities opposing the motion; and the moving
6 party has the opportunity to respond to the opposing party's arguments in a reply memorandum;

7 WHEREAS the parties have found that proceeding under Local Rule 230, rather than Local
8 Rule 251, provides greater clarity and exposition of the issues and arguments implicated by their
9 respective motions;

10 WHEREAS the parties believe that the Court is better served in its consideration of the
11 parties' respective discovery motions by adopting the format set out in Local Rule 230;

12 **NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE** to notice and
13 prepare all discovery motions pursuant to the provisions set out in Local Rule 230 rather than
14 Local Rule 251.

15 DATED: June 4, 2018

SAGY LAW ASSOCIATES

17 By: _____/S/ Rony Sagy _____
18 RONY SAGY

19 Attorneys for Plaintiffs MORGAN HILL
20 CONCERNED PARENTS
21 ASSOCIATION and CONCERNED
PARENTS ASSOCIATION

22 Dated: June 4, 2018

XAVIER BECERRA

23 Attorney General of California
ISMAEL A. CASTRO
24 Supervising Deputy Attorney General

25 By: _____/S/ Julia R. Jackson _____
26 JULIA R. JACKSON

27 Deputy Attorney General
Attorneys for Defendant
28 California Department of Education

1 **GOOD CAUSE APPEARING THEREFOR, THE COURT HEREBY ORDERS** that,
2 until the Court provides otherwise, the parties are to observe the procedures set out in the Eastern
3 District of California’s Local Rule 230 when filing discovery motions in this action.

4 **IT IS SO ORDERED.**

5 Date: June 5, 2018

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ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

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