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8	
9	UNITED STATES DISTRICT COURT
10	EASTERN DISTRICT OF CALIFORNIA
11	MARIE ELLIOTT, ANDREA KRUSE,) CASE NO.: 2:12-CV-00117-MCE-DAD
12	PATRICIA ROOTS, and RANDI WILSON, individually, STIPULATION AND ORDER
13) REGARDING WRITTEN DEPOSITION Plaintiffs,
14)
15	v.
16	AMADOR COUNTY UNIFIED)
17	SCHOOL DISTRICT, AMADOR) COUNTY OFFICE OF EDUCATION,)
18	THERESA HAWK, in her individual and official capacity, and DOES 1 through 50,
19	inclusive,
20	Defendants.
21	On August 14, 2012, Plaintiffs served deposition notices for oral deposition and for th
22	production of documents on August 30, 2012 for:
23	DEPONENT: Defendant, Amador County Unified School District's, Person Mos
24	Knowledgeable about any "communications between Amador County Unified School District and
25	·
26	the Amador County Board of Supervisors REGARDING any or all of the Plaintiffs including
27	MARIE ELLIOTT, ANDREA KRUSE, PATRICIA ROOTS, and RANDI WILSON, from Januar
28	2010 through November 10, 2011"; and -1-
	Stipulation and Order Re: Discovery

1	DEPONENT: Defendant, Amador County Office of Education's, Person Most
2	Knowledgeable about any "communications between Defendant, Amador County Office of
3	Education, and the Amador County Board of Supervisors REGARDING any or all of the Plaintiffs
4	including MARIE ELLIOTT, ANDREA KRUSE, PATRICIA ROOTS, and RANDI WILSON, from
5	January 2010 through November 10, 2011."
6	Counsel for Defendants responded in a letter dated August 21, 2012 raising various
7	objections to the notices.
8	Therefore, a stipulation has been sought and obtained by the parties, through their respective
9	undersigned counsel, that given the date of the upcoming opposition to the motion to dismiss,
10	Defendants agree the Deponent will provide responses to these written deposition questions within
11	seven (7) days after the questions are served via email, excluding weekends and holidays, up to thirty
12	(30) questions; and the parties stipulate that Defendants will keep form related objections (i.e. vague,
13	ambiguous) to a minimum and that interrogatory definitions of terms should not be required unless
14	the question intends for a very particular meaning of a term.
15	ATTORNEYS FOR DEFENDANTS/DEPONENTS:
16	Dated: August 23, 2012 _/s/ JASON M. SHERMAN_(as authorized 8/23/12)_
17	ALESA SCHACHTER JASON M. SHERMAN
18	ATTORNEYS FOR PLAINTIFFS:
19	Dated: August 23, 2012/s/ RALPH C. LEE
20 21	ETAN E. ROSEN RALPH C. LEE
22	ORDER
23	DUD CLIANT TO CTIDIU ATION IT IC CO ODDEDED
24	PURSUANT TO STIPULATION, IT IS SO ORDERED.
25	DATED: August 27, 2012.
26	Dale A. Dage
27	DALE A. DROZD
28	Ddad1\orders.civil\elliott0117.stip.disc.ord UNITED STATES MAGISTRATE JUDGE
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Stipulation and Order Re: Discovery