1	Rivera&Associates	
2	2180 Harvard Street, Suite 310 Sacramento, California 95815	
3	Tel: 916-922-1200 Fax: 916 922-1303	
4	Jesse M. Rivera, CSN 84259	
5	Jonathan B. Paul, CSN 215884 Shanan L. Hewitt, CSN 200168	
6	Kelly A. Yokley, CSN 192015	
7	Attorneys for Defendants,	
8	County of Sacramento and Sacramento Public Library Authority	
9	IN THE UNITED STATES DISTRICT COURT	
10	IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA	
11	III AND FOR THE EASTE.	RIV DISTRICT OF CALIFORNIA
12	CONNIE ARNOLD,	) <b>CASE NO.</b> 2:12-cv-01998-LKK-EFB
13	Plaintiff,	UPDATED STATUS REPORT OF DEFENDANTS COUNTY OF
14	VS.	) SACRAMENTO AND SACRAMENTO PUBLIC LIBRARY AUTHORITY
15	COUNTY OF SACRAMENTO, et al.	Scheduling Conference: April 29, 2013
<ul><li>16</li><li>17</li></ul>	Defendant.	<ul><li>Time: 10:00 a.m.</li><li>Location: Courtroom 4</li><li>Before: Honorable Lawrence K. Karlton</li></ul>
18	Defendants County of Sacramento and Sacramento Public Library Authority (hereinafter	
19	"defendants") hereby submit their updated status report.	
20	Summary of Facts	
21	Plaintiff Connie Arnold has brought the subject action alleging violation of the	
22	Americans with Disabilities Act (ADA) - Title II, as well as other federal and state claims. Ms.	
23	Arnold, who claims to be a person with a mobility disability and requires the use of the a	
24	wheelchair, claims to have been denied access at the Sylvan Oaks Public Library and	
25	Crosswoods Park in the City of Citrus Heights, within the County of Sacramento. Plaintiff	
26	claims that denial of access took place in September 2011 and that she has been deterred from	
27	returning to the park and library since that time.	
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## **Anticipated Discovery**

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On January 11, 2013, the parties undertook a joint inspection of the Crosswoods Park and Sylvan Oaks Public Library prior to formal discovery. Thereafter on April 1, 2013, Plaintiff put forth her demand for injunctive relief to defendants. Said demand is currently under consideration by defendants' principals and defendants believe that early resolution of this matter may be possible without the need for formal discovery. Defendants would ask that this matter be set for a settlement conference within thirty days of the scheduling conference to avoid otherwise unnecessary discovery. However, in acknowledgment of the Court's need to set forth a litigation schedule defendants propose the following discovery and scheduling plan:

10 Initial Scheduling Conference: April 29, 2013

11 30-Day Discovery Stay Until: May 29, 2013

12 Fact Discovery Cut-off: November 25, 2013

13 Expert Disclosures: January 24, 2014

Rebuttal Expert Disclosures: February 24, 2014

15 | Expert Discovery Cut-off: April 24, 2014

16 Last Day to File Dispositive Motions: June 23, 2014

Jury Trial: October 21, 2014

## **Future Proceedings**

Defendants are informed and believe that this is a limited disabled access claim for purely injunctive relief. As such, the parties agreed to initially conduct the joint inspection and attempt to resolve the case under the schedule proposed above. Based upon the demand made by plaintiff following the joint inspection, defendants request the assistance of a magistrate judge for an early settlement conference before engaging in formal discovery.

Dated: April 15, 2013 Respectfully submitted,

By:

**RIVERA & ASSOCIATES** 

/s/ Jonathan B. Paul

JONATHAN B. PAUL

Attorney for County of Sacramento and Sacramento Public Library Authority

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