

Fagen Friedman & Fulfrost, LLP
520 Capitol Mall, Suite 400
Sacramento, California 95814
Main: 916-443-0000 • Fax: 916-443-0030

1 FAGEN FRIEDMAN & FULFROST, LLP
Kimberly A. Smith, SBN 176659
2 Anne M. Sherlock, SBN 210205
Cynthia M. Smith, SBN 220861
3 520 Capitol Mall, Suite 400
Sacramento, California 95814
4 Phone: 916-443-0000
Fax: 916-443-0030

5 Attorneys for Defendant, FOLSOM CORDOVA
6 UNIFIED SCHOOL DISTRICT

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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

10
11 KARIM ABDELLA and PATRICIA D.
MORGAN ABDELLA,

12 Plaintiff,

13 vs.

14 FOLSOM CORDOVA UNIFIED SCHOOL
15 DISTRICT,

16 Defendant.

No. 2:14-cv-1259 KJM DAD PS

**STIPULATION AND ORDER TO
CONTINUE MOTIONS DEADLINES
AND HEARING DATE**

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2:14-cv-1259 KJM DAD PS

STIPULATION TO CONTINUE MOTIONS DEADLINES
AND HEARING DATE; [PROPOSED] ORDER

1 WHEREAS, the parties participated in a Status Conference with the Court on October 10,
2 2014;

3 WHEREAS, the Court set deadlines by which the Administrative Record must be lodged
4 with the Court, by which any motion to supplement the record or conduct discovery must be filed,
5 the briefing schedule, and the hearing date;

6 WHEREAS, the parties stipulated twice to extend the date by which the Administrative
7 Record must be lodged with the Court and stipulated once to extend the date by which any motion
8 to supplement the record or conduct discovery must be filed;

9 WHEREAS, the parties lodged the Administrative Record with the Court on January 30,
10 2015;

11 WHEREAS, it took the parties longer than anticipated to review and lodge the voluminous
12 Administrative Record, and

13 WHEREAS, Plaintiffs have two special education hearings scheduled before the Office of
14 Administrative Hearings in March and April 2015 for their other child, and Plaintiffs require
15 additional time to prepare motions to supplement the record and their motion for summary
16 judgment;

17 WHEREAS, Defendant does not object to extending the deadlines in this matter;

18 WHEREAS, the parties have met and conferred regarding seeking an extension of the
19 briefing schedule and hearing dates set by the Court at the Status Conference on October 10, 2014,
20 and the motion date subsequently extended via stipulation to file motions to supplement the record
21 and/or conduct discovery;

22 WHEREAS, the parties respectfully request that the motion deadline, the briefing
23 schedule, and the hearing date set by the Court be extended in accordance with the parties'
24 stipulation below or to a similar date convenient for the Court's calendar;

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IT IS STIPULATED THAT the following deadlines will take effect:

File any Motion to Supplement the Record	June 19, 2015
File any Motion for Summary Judgment	September 25, 2015
Opposition to Motion for Summary Judgment	October 9, 2015
Reply to Opposition to Motion for Summary Judgment	October 16, 2015
Motion Hearing	October 30, 2015

DATED: February 4, 2015

/s/ Patricia D. Morgan
Patricia D. Morgan Abdella, In Pro Se

DATED: February 4, 2015

/s/ Karim A. Abdella
Karim A. Abdella, In Pro Se

DATED: February 4, 2015

FAGEN FRIEDMAN & FULFROST, LLP

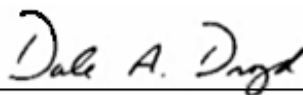
By: /s/ Cynthia M. Smith
Cynthia M. Smith
Attorneys for Defendant, FOLSOM
CORDOVA UNIFIED SCHOOL DISTRICT

ORDER

Pursuant to the stipulation of the parties to this matter, IT IS ORDERED THAT the deadlines set by the Court be extended as follows:

File any Motion to Supplement the Record	June 19, 2015
File any Motion for Summary Judgment	September 25, 2015
Opposition to Motion for Summary Judgment	October 9, 2015
Reply to Opposition to Motion for Summary Judgment	October 16, 2015
Motion Hearing	October 30, 2015

Dated: February 9, 2015



DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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