

ALESA SCHACHTER, ESQ. (SBN 102542)  
JASON M. SHERMAN, ESQ. (SBN 245190)  
JOHNSON SCHACHTER & LEWIS  
A Professional Law Corporation  
California Plaza  
2180 Harvard Street, Suite 560  
Sacramento, CA 95815  
Telephone: (916) 921-5800  
Facsimile: (916) 921-0247  
E-mail: [alesa@jsl-law.com](mailto:alesa@jsl-law.com)  
E-mail: [jason@jsl-law.com](mailto:jason@jsl-law.com)

Attorneys for DEFENDANTS:  
LODI UNIFIED SCHOOL DISTRICT,  
CATHERINE NICHOLS-WASHER, and  
NEIL YOUNG

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JEANNE KITCHEN,

Plaintiff,

v.

LODI UNIFIED SCHOOL DISTRICT;  
CATHERINE NICHOLS-WASHER, in her  
official capacity as Superintendent of the Lodi  
Unified School District, NEIL YOUNG in his  
official capacity as Director of Personnel of  
the Lodi Unified School District,

Defendants.

**CASE NO. 2:14-cv-01436-WBS-EFB**

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION TO ALL  
PARTIES TO SERVE RULE 26(a)(1)  
INITIAL DISCLOSURES**

Complaint Filed: June 16, 2014  
Trial Date: None Set

Pursuant to Local Rule 144(a), the parties agree and stipulate that an extension should be granted to all parties to serve initial disclosures required by Federal Rule of Civil Procedure 26(a)(1):

- In the Scheduling Order issued by the Court on November 24, 2014, the Court ordered the parties to serve initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) by no later than January 30, 2015;

- Counsel for Plaintiff and Defendants have met and conferred and agreed that both sides would like additional time to prepare initial disclosures;
- Defendants have filed a motion to dismiss Plaintiff's First Amended Complaint, which is scheduled for a hearing on February 23, 2015, and the parties agree that an extension will not substantively delay the case
- The parties have agreed to an extension of six weeks (42 days) to serve initial disclosures, on March 13, 2015.

The parties therefore agree and stipulate that all parties should be granted an extension to serve initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) to March 13, 2015.

The parties respectfully request an order from the Court allowing all parties an extension to serve initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) to March 13, 2015.

Dated: January 8, 2015

JOHNSON SCHACHTER & LEWIS  
A Professional Law Corporation

By: /s/ Alesa Schachter

ALESA SCHACHTER

JASON M. SHERMAN

Attorneys for Defendant LODI UNIFIED  
SCHOOL DISTRICT

Dated: January 8, 2015

THE LEGAL AID SOCIETY - EMPLOYMENT  
LAW CENTER

By: /s/ Jinny Kim (authorized on January 8, 2015)

JINNY KIM

Attorneys for Plaintiff, JEANNE KITCHEN

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

**Dated: January 8, 2015**



**WILLIAM B. SHUBB**

**UNITED STATES DISTRICT JUDGE**