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6 Attorneys for Plaintiff and Counterclaim
Defendant SACRAMENTO CITY UNIFIED
7 SCHOOL DISTRICT

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 SACRAMENTO CITY UNIFIED SCHOOL
11 DISTRICT,

12 Plaintiffs,

13 vs.

14 K.H., J.H., and R.H.

15 Defendant.

Case No. 2:14-cv-01549-TLN-DAD

**JOINT STIPULATION RE: EXTENSION
TO MEET AND CONFER AND RETURN
RESPONSE TO COURT ON PROPOSED
JUDGMENT; AND ORDER**

16 R.H., by and through her Guardians ad litem, J.H
17 and K.H. and K.H., Individually,

18 Counterclaimants,

19 vs.

20 SACRAMENTO CITY UNIFIED SCHOOL
DISTRICT

21 Counterclaim Defendant.

1 TO THE HONORABLE COURT:

2 IT IS HEREBY STIPULATED, pursuant to Local Rules 143 and 144, by and between Plaintiff
3 and Cross-Defendant Sacramento City Unified School District (“District”) and Defendants and Cross-
4 Complainants J.H. and K.H., and as guardian ad litem for R.H. (“Defendants” and collectively with the
5 District, the “parties”), through their counsel of record, through its counsel of record, as follows:

6 1. On October 7, 2016, the Court issued its Opinion regarding the parties’ cross-motions for
7 summary judgment (“Opinion”);

8 2. On December 13, 2016, Defendants filed a Proposed Judgment pertaining to claims
9 arising under the Individuals with Disabilities Educations Improvement Act (“IDEA”), as adjudicated by
0 the Court’s Opinion;

1 3. On December 20, 2016, Plaintiff filed an opposition and objections to the Proposed
2 Judgment;

3 4. On January 9, 2017, Defendants filed a reply to the District’s opposition and objections to
4 the Proposed Order;

5 5. On January 10, 2017, the Court ordered the parties to meet and confer to discuss and
6 attempt to resolve their differing views on the proposed judgment, including the calculation of any
7 potential interest owed, and to file a Joint Proposed Judgment within fourteen (14) days of the Court’s
8 subject order;

9 6. On Friday, January 20, 2017, counsel for the parties participated in a telephone
20 conversation to meet and confer about the proposed judgment, in accordance with the Court’s Order. In
21 addition to the proposed judgment, counsel discussed the possibility of settlement of this action in full,
22 and agreed that it is in the best interest of the parties’ ability to successfully meet and confer regarding
23 same, to extend the time to submit to the Court a joint proposed judgment or a joint statement explaining
24 the parties’ positions as to a proposed judgment, to February 15, 2017;

25 7. This is the first request for modification to the Court’s January 10, 2017 order; and

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1 8. Based on the foregoing, the parties request the Court’s approval to extend the time to
2 submit to the Court a joint proposed judgment or a joint statement explaining the parties’ positions as to
3 a proposed judgment, to February 15, 2017.

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5 Dated: January 24, 2017

Respectfully submitted,

6 **LOZANO SMITH**

7 /s/ Sloan R. Simmons
8 SLOAN R. SIMMONS
9 SARAH L. GARCIA
10 Attorneys for Plaintiff and Cross-Defendant
SACRAMENTO CITY UNIFIED SCHOOL DISTRICT

1 Dated: January 24, 2017

Respectfully submitted,

2 **RUDERMAN & KNOX, LLP**

3 /s/ Colleen A. Snyder
4 F. RICHARD RUDERMAN
5 COLLEEN A. SNYDER
6 Attorney for Defendants and Cross-Complainants
7 R.H., by and through her Guardians ad litem, J.H and K.H.
8 and K.H.,
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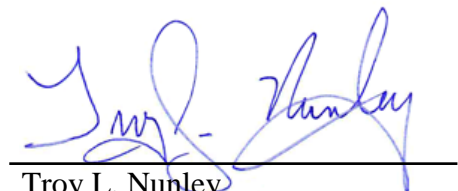
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ORDER

Based upon the foregoing Stipulation between Plaintiff and Cross-Defendant Sacramento City Unified School District (“District”) and Defendants and Cross-Complainants J.H. and K.H., and as guardian ad litem for R.H. (“Defendants”), and GOOD CAUSE APPEARING THEREFORE, THE COURT HEREBY ORDERS the deadline for the parties to submit to the Court a joint proposed judgment or a joint statement explaining their positions as to a proposed judgment, is extended to February 15, 2017.

IT IS SO ORDERED.

DATED: January 24, 2017



Troy L. Nunley
United States District Judge