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 7 IN THE UNITED STATES DISTRICT COURT
 8 FOR THE EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION
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10 W.C. BY AND THROUGH HIS MOTHER,
 11 C.M.,

12 Plaintiff(s),

13 v.

14 PLACER HILLS UNION SCHOOL DISTRICT,
 STEVE SCHAUMLEFFEL,

15 Defendant(s).
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Case No.: 2:15-cv-00716-TLN-CKD

**STIPULATION AND ORDER TO
 EXTEND THE NON-EXPERT
 DISCOVERY DEADLINE FOR THE
 PURPOSE OF TAKING A FRCP
 30(b)(6) DEPOSITION**

*Magistrate Judge Carolyn K. Delaney
 Complaint Filed: March 30, 2015
 1st Amend. Comp. Filed: June 8, 2015
 Trial Date: May 15, 2017*

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 18 THE PARTIES TO THIS MATTER, by and through their respective attorneys of record
 19 herein, do hereby stipulate and agree that the non-expert discovery deadline of **June 27, 2016** be
 20 extended to **August 30, 2016** for the purpose of completing one deposition that was noticed
 21 pursuant to Federal Rule of Civil Procedure 30(b)(6) of Defendant PLACER HILLS UNION
 22 SCHOOL DISTRICT. The basis for the extension is as follows:

- 23 1. Plaintiff noticed the FRCP deposition for June 22, 2016. Defendant has identified three
 24 witnesses that it intends to designate to testify as to certain categories set forth by
 25 Plaintiff. However, only two of the witnesses were available on June 22, 2016. A third
 26 witness was available June 24, 2016, but counsel for Plaintiff was scheduled to be in
 27 hearing in San Francisco on that date.
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- 2. On June 21 and 22, Defendants took depositions of Plaintiff W.C. and his mother C.M. along with designated witnesses from the Placer County Department of Education. At that time, counsel met and conferred and determined that, since a mediation is scheduled on August 16, 2016 before Patricia Tweedy, Esq., time and expense might be spared in continuing out the deadline for the FRCP 30(b)(6) deposition until after the mediation.
- 3. Expert designations are not due in this matter until August 30, 2016. Dispositive motions must be heard by December 8, 2016 and the trial date is May 15, 2017.
- 4. Therefore, the parties proposed new non-expert discovery deadline – solely for the purposes of the FRCP 30(b)(6) deposition – of August 30, 2016 does not interfere with expert discovery, which only can start after August 30, 2016, or with the timing of dispositive motions or trial.
- 5. The parties previously sought by stipulation filed February 12, 2016 a continuance of the trial date due to the schedule of Defendant STEVE SCHAUMLEFFEL along with the extension of other deadlines, including non-expert discovery. The Court approved the stipulation on February 19, 2016 and ordered the trial continuance and corresponding extensions to the dates set forth above.
- 6. The extension requested will not delay the trial or impact any other deadline presently set in this action.

Dated: June 23, 2016

JACOBSON, HANSEN & McQUILLAN

/s/ Leith B. Hansen

By: _____

LEITH B. HANSEN, Attorneys for
Defendants, PLACER HILLS UNIFIED
SCHOOL DISTRICT, sued herein as PLACER
HILLS UNION SCHOOL DISTRICT and
STEVE SCHAUMLEFFEL

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Dated: June ____, 2016

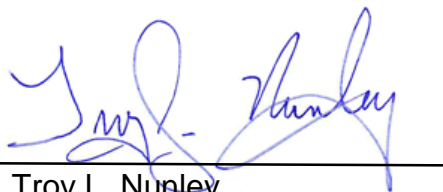
LEIGH LAW GROUP, P.C.

/s/ Jay T. Jambeck
By: _____
JAY T. JAMBECK, Attorneys for Plaintiff,
W.C., by and through his Mother, C.M.

ORDER

IT IS HEREBY ORDERED that the non-expert discovery deadline shall be extended to August 30, 2016 for the purpose of taking the Federal Rule of Civil Procedure 30(b)(6) deposition noticed by Plaintiff for the reasons set forth in the accompanying Stipulation.

Dated: June 24, 2016



Troy L. Nunley
United States District Judge