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 18 Sacramento City Unified School District

19 **IN THE UNITED STATES DISTRICT COURT**
 20 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

21 T.V. and A.V. by and through their guardians
 22 Will Valerio and Jackie Valerio, and Will
 23 Valerio and Jackie Valerio, individually, D.S.
 24 by and through her guardian Arthur Aleman,
 25 I.M. and I.M. by and through their guardians
 26 Jorge Maranon and Isabella Maranon, Jorge
 27 Maranon and Isabella Maranon individually,
 28 D.S. by and through his guardians Adrian
 Sanchez and Stephanie Sanchez, J.S. by and
 through David Schnetz and Amy Schnetz,
 A.S. by and through her guardian Stacey
 Swett,

Case No.: 2:15-cv-00889-KJM-AC

**STIPULATION AND TO EXTEND
 DISCOVERY TIMELINE AND
 FURTHER STATUS CONFERENCE**

Plaintiffs,

vs.

SACRAMENTO CITY UNIFIED SCHOOL
 DISTRICT,

Defendant.

1 STIPULATION

2 Pursuant to Federal Rule of Civil Procedure 16, Plaintiffs, through their attorneys of record,
3 and Defendant, through its attorneys of record, hereby request that the Court modify the current
4 Scheduling Order and extend the discovery and expert disclosure deadlines as follows:

5 1. On February 2, 2016, the parties attended an initial scheduling conference. The
6 Court's Status (Pretrial Scheduling) Order was filed on February 12, 2016 as Docket Number 23.

7 2. On February 17, 2016, Plaintiffs filed a Third Amended Complaint. On June 11,
8 2015, Plaintiffs filed a First Amended Complaint ("FAC") with this Court. The following dates
9 were scheduled:

- 10 a. Discovery cut-off: March 31, 2017
- 11 b. Expert disclosure: April 2, 2017
- 12 c. Supplemental expert disclosure: May 2, 2017
- 13 d. Expert discovery cut-off: July 31, 2017
- 14 e. Joint mid-litigation proposal: August 31, 2017
- 15 f. Mid-litigation status conference: September 14, 2017 at 2:30 pm

16 3. Good cause exists to extend the dates set forth in the Court's February 12, 2016
17 Scheduling Order. The parties have worked diligently to complete discovery, including undertaking
18 written discovery. The parties are also in the process of completing depositions. However, due to
19 the complexity of this case, including the number of Plaintiffs and their Guardians ad Litem, it is
20 not feasible to complete all requisite depositions by March 31, 2017, including the District
21 employee depositions, and provide those deposition transcripts to retained experts for their review,
22 analysis, and incorporation into their reports by the next day, April 1, 2017.

23 4. There are currently dates scheduled for dispositive motions or trial that would need
24 to be altered.

25 5. Based on the foregoing, IT IS HEREBY STIPULATED, by and between all parties
26 through their respective counsel of record that:

- 27 a. Discovery cut-off be extended to May 31, 2017
- 28 b. Expert disclosure deadline be extended to July 28, 2017

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- c. Supplemental expert disclosure deadline be extended to August 31, 2017
- d. Expert discovery cut-off be extended to September 22, 2017
- e. Joint mid-litigation proposal deadline be extended to September 28, 2017
- f. Mid-litigation status conference be continued to October 12, 2017 at 2:30 pm

IT IS SO STIPULATED.

DATED: February 23, 2017

LEIGH LAW GROUP

By: /s/ Jay Jambeck
 Jay Jambeck
 Nathan Sullivan
 Attorneys for Plaintiffs

DATED: February 23, 2017

SPINELLI, DONALD & NOTT

By: /s/ Domenic D. Spinelli
 Domenic D. Spinelli
 Alison W. Winter.
 Attorneys for Defendant

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ORDER

Pursuant to the stipulation of the parties, and for good cause shown thereby, the request to continue the dates set forth in the February 12, 2016 Status (Pretrial Scheduling) is GRANTED. It is hereby ORDERED that:

- a. The discovery cut-off is extended to May 31, 2017;
- b. The expert disclosure deadline is extended to July 28, 2017;
- c. The supplemental expert disclosure deadline is extended to August 31, 2017;
- d. The expert discovery cut-off is extended to September 22, 2017;
- e. The joint mid-litigation proposal filing deadline is extended to September 28, 2017;
- f. A mid-litigation status conference will be held on October 12, 2017 at 2:30 pm in Courtroom 3.

IT IS SO ORDERED.

Dated: March 1, 2017


UNITED STATES DISTRICT JUDGE