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17 *Attorneys for Defendant*
 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 [PROPOSED]
 ORDER TO EXTEND DISCOVERY
 TIMELINES**

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. The following
8 dates were scheduled:

9 a. Discovery cut-off: March 31, 2017

10 b. Expert disclosure: April 2, 2017

11 c. Supplemental expert disclosure: May 2, 2017

12 d. Expert discovery cut-off: July 31, 2017

13 e. Joint mid-litigation proposal: August 31, 2017

14 f. Mid-litigation status conference: September 14, 2017 at 2:30 pm

15 3. On February 23, 2017, the parties stipulated to extend the above deadlines as
16 follows:

17 a. Discovery cut-off be extended to May 31, 2017

18 b. Expert disclosure deadline be extended to July 28, 2017

19 c. Supplemental expert disclosure deadline be extended to August 31, 2017

20 d. Expert discovery cut-off be extended to September 22, 2017

21 e. Joint mid-litigation proposal deadline be extended to September 28, 2017

22 f. Mid-litigation status conference be continued to October 12, 2017 at 2:30 pm

23 4. On March 1, 2017, the Court entered an order approving the parties' stipulated dates.

24 5. Good cause exists to extend the dates set forth in the Court's March 1, 2017

25 Scheduling Order. The parties have worked diligently to complete discovery, including undertaking
26 several rounds of written discovery. Additionally, Defendant noticed and completed the
27 depositions of thirteen of the Plaintiffs/parent representatives. Due to calendar conflicts and other
28 scheduling issues, those depositions occurred over a period of several months and concluded on

1 May 19, 2017. Plaintiffs have noticed a Rule 30(b)(6) deposition to occur after the conclusion of
2 the depositions of Plaintiffs but due to the complexity of the issues involved, along with the
3 logistics of scheduling district employees responsive to the Rule 30(b)(6) categories at this time of
4 year, additional time will be necessary for the Rule 30(b)(6) deposition to conclude within the
5 present discovery schedule.

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

8 a. Discovery cut-off be extended solely for the purposes of completing the Rule
9 30(b)(6) deposition noticed by Plaintiffs on May 16, 2017. This deposition will be
10 completed by July 28, 2017.

11 b. Expert disclosure deadline be extended to September 15, 2017.

12 c. Supplemental expert disclosure deadline be extended to October 13, 2017.

13 d. Expert discovery cut-off be extended to November 30, 2017.

14 e. Joint mid-litigation proposal deadline extended to December 7, 2017.

15 f. Mid-litigation status conference extended to December 14, 2017 at 2:30 pm.

16 **IT IS SO STIPULATED.**

17
18 DATED: May 31, 2017

LEIGH LAW GROUP, P.C.

/s/ Jay T. Jambeck

19
20 By:

Jay T. Jambeck
Attorneys for Plaintiffs

21
22
23 DATED: May 31, 2017

SPINELLI, DONALD & NOTT

/s/ Domenic D. Spinelli

24
25 By:

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 March 1, 2017 scheduling order is GRANTED. It is hereby

ORDERED that:

- a. Discovery cut-off be extended solely for the purposes of completing the Rule 30(b)(6) deposition noticed by Plaintiffs on May 16, 2017. This deposition will be completed by July 28, 2017.
- b. Expert disclosure deadline be extended to August 15, 2017.
- c. Supplemental expert disclosure deadline be extended to September 15, 2017.
- d. Expert discovery cut-off be extended to October 10, 2017.
- e. Joint mid-litigation proposal deadline remain September 28, 2017.
- f. Mid-litigation status conference remain on October 12, 2017 at 2:30 pm in Courtroom 3.

IT IS SO ORDERED.

DATED: June 12, 2017.


UNITED STATES DISTRICT JUDGE