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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 ORDER
 REGARDING 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 as follows:

5 1. On May 31, 2017, the parties submitted a Stipulation and Proposed Order to Extend
6 Discovery Timelines. Inadvertently and unfortunately, the continued dates to which the parties
7 stipulated were not accurately reflected in the Proposed Order. On June 12, 2017, in approving the
8 parties' stipulation and entering the Order as provided, the Court understandably relied on those
9 inaccurate dates. The parties now request that the Court enter an Order with their originally agreed-
10 upon dates.

11 2. Good cause exists to enter an Order with the parties' originally agreed-upon,
12 continued dates. These dates will continue certain aspects of the discovery timeline beyond the
13 current ordered dates. The parties have worked diligently to complete discovery, including
14 undertaking several rounds of written discovery. Additionally, Defendant noticed and completed
15 the depositions of thirteen of the Plaintiffs/parent representatives. Due to calendar conflicts and
16 other scheduling issues, those depositions occurred over a period of several months and concluded
17 on May 19, 2017. Plaintiffs have noticed a Rule 30(b)(6) deposition to occur after the conclusion of
18 the depositions of Plaintiffs but due to the complexity of the issues involved, along with the
19 logistics of scheduling district employees responsive to the Rule 30(b)(6) categories at this time of
20 year, additional time will be necessary for the Rule 30(b)(6) deposition to conclude within the
21 present discovery schedule. With discovery continued for the purposes of this deposition, it is
22 appropriate to similarly extend the timeline for the remainder of discovery so that the parties may
23 fully prepare for trial.

24 3. Based on the foregoing, IT IS HEREBY STIPULATED AND REQUESTED, by
25 and between all parties through their respective counsel of record that the Court enter the following
26 dates, as presented in the May 31 2017 Stipulation:

27 a. Discovery cut-off be extended for the purposes of completing the Rule
28 30(b)(6) deposition noticed by Plaintiffs, Notice of which is attached hereto as Exhibit A, only. This

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ORDER

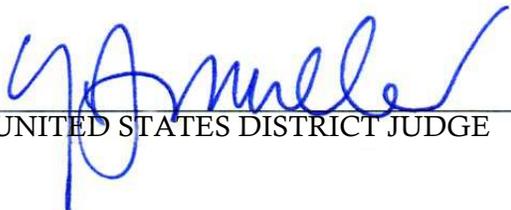
Pursuant to the stipulation of the parties, and for good cause shown thereby, the request to continue the dates set forth in the June 12, 2017 scheduling order is GRANTED. It is hereby

ORDERED that:

- a. Discovery cut-off be extended for the purposes of completing the Rule 30(b)(6) deposition noticed by Plaintiffs, Notice of which is attached hereto as Exhibit A, only. This deposition will be completed by July 28, 2017.
- b. Expert disclosure deadline be extended to September 15, 2017
- c. Supplemental expert disclosure deadline be extended to October 13, 2017
- d. Expert discovery cut-off be extended to November 30, 2017
- e. Joint mid-litigation proposal deadline extended to December 7, 2017
- f. Mid-litigation status conference extended to December 14, 2017 at 2:30 pm

IT IS SO ORDERED.

DATED: June 30, 2017.


UNITED STATES DISTRICT JUDGE