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CHARLES THIBIDEAU, BETTY JO WESSINGER,
JANNA CAMBRA, KEVIN BROWN, ROGER
STOCK and DR. TODD CUTLER*

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

JENNIFER HUGUNIN, PATRICK)
HUGUNIN, D.H., a minor by and through his)
guardian ad litem JENNIFER HUGUNIN;)
KEITH CALDWELL, NICOLE HILL, X.C.)
a minor by and through his guardian ad litem)
KEITH CALDWELL; TRISHIA PITTS,)
CARL PITTS, N.P., a minor by and through)
his guardian ad litem TRISHIA PITTS; TODD)
VROOMAN, LAURA VROOMAN, S.V., a)
minor by and through his guardian ad litem)
TODD VROOMAN; RICHARD ROGERS,)
TERRILL ROGERS, P.R, a minor by and)
through his guardian ad litem RICHARD)
ROGERS; MICHELLE MANCOUR and G.I.,)
a minor by and through his guardian ad litem)
MICHELLE MANCOUR,)
Plaintiffs,)

vs.

ROCKLIN UNIFIED SCHOOL DISTRICT)
SHERRY MCDANIEL, CHARLES)
THIBIDEAU, BETTY JO WESSINGER,)
JANNA CAMBRA, KEVIN BROWN,)
ROGER STOCK, DR. TODD CUTLER, and)
Does 1-30, Inclusively,)
Defendants.)

**CASE NO. 2:15-CV-00939-MCE-DB
AMENDED STIPULATION AND ORDER RE:
REVISING OF PRETRIAL SCHEDULING
ORDER**

1 This Stipulation is entered into by and between plaintiffs, TRISHIA PITTS, CARL PITTS, N.P., a
2 minor by and through his guardian ad litem TRISHIA PITTS, by and through their counsel Peter W.
3 Alfert, of Hinton Alfert PC, and Todd Boley and Zoya Yarnykh of Boley Law; and defendants,
4 ROCKLIN UNIFIED SCHOOL DISTRICT CHARLES THIBIDEAU, BETTY JO WESSINGER,
5 JANNA CAMBRA, KEVIN BROWN, ROGER STOCK, and DR. TODD CUTLER, by and through their
6 counsel, Carol Wieckowski of Evans, Wieckowski, Ward & Scoffield; and defendant SHERRY
7 McDANIEL, by and through her counsel, Gregory P. O’Dea and Natasha Langenfeld of Longyear, O’Dea
8 & Lavra, LLP.

9 The parties to this action hereby stipulate, by and through their respective undersigned counsel of
10 record, as follows:

11 WHEREAS, the initial Pretrial Scheduling Order (Doc. 40) was previously modified on June 30,
12 2016, thereby extending fact discovery cut-off from October 17, 2016 to February 28, 2017. Expert
13 discovery was extended to be completed by May 31, 2017, from the initial date of December 16, 2016
14 (See Doc. 91). “Completed” means that all discovery shall have been conducted so that all depositions
15 have been taken and all disputes relative to discovery shall have been resolved. The parties stipulate that
16 they will not be able to conduct all discovery needed by the current cutoff date due to potential additional
17 plaintiffs (Doc. 79, motion currently pending), and there has been no discovery with respect to these
18 proposed new plaintiffs. This Court, on its own motion, has taken this matter off trial calendar on
19 November 2, 2016 (Doc. 96, text-only Minute Order).

20 Parties propose June 30, 2017 as a fact discovery cutoff date. Plaintiffs have been diligently
21 responding to and pursuing discovery, and have engaged in numerous meet and confer efforts with
22 defense counsel through letters and conference calls. Some depositions have been taken and completed,
23 yet several remain outstanding, of both witnesses and Defendants, including Sherry McDaniel.

24 WHEREAS, the current expert disclosure deadline is May 31, 2017. The parties, in light of the
25 requested fact discovery cutoff date, stipulate to continue the expert disclosure deadline accordingly, to
26 September 29, 2017.

27 WHEREAS, the current last day to hear dispositive motions is April 13, 2017 (See Doc. 40). The
28 parties, in light of the requested discovery cutoff dates above, stipulate to continue the last day to hear

1 dispositive motions to December 29, 2017.

2 WHEREAS, a Settlement Conference is currently set for December 22, 2016 before the Honorable
3 Edmund F. Brennan. The parties believe that this Settlement Conference may prove to be productive,
4 given the current state of discovery, as well as the resolution of all of the Plaintiffs' cases except for the
5 Pitts family, the only remaining active Plaintiffs in this matter.

6 The parties therefore respectfully request that the Court enter a Revised Pretrial Scheduling Order
7 reflecting those dates.

8 **IT IS SO STIPULATED:**

9 Dated: 12/6/16

HINTON ALFERT, PC

10 By: _____/s/_____
11 PETER W. ALFERT
12 Attorney for Plaintiffs, JENNIFER HUGUNIN,
13 PATRICK HUGUNIN, D.H., a minor by and
14 through his guardian ad litem JENNIFER
15 HUGUNIN; KEITH CALDWELL, NICOLE
16 HILL, X.C. a minor by and through his guardian ad
17 litem KEITH CALDWELL; TRISHIA PITTS,
18 CARL PITTS, N.P., a minor by and through his
19 guardian ad litem TRISHIA PITTS

16 Dated: 12/6/16

LAW OFFICES OF TODD BOLEY

17 By: _____/s/_____
18 TODD BOLEY
19 Attorney for Plaintiffs, JENNIFER HUGUNIN,
20 PATRICK HUGUNIN, D.H., a minor by and
21 through his guardian ad litem JENNIFER
22 HUGUNIN; KEITH CALDWELL, NICOLE
23 HILL, X.C. a minor by and through his guardian ad
24 litem KEITH CALDWELL; TRISHIA PITTS,
25 CARL PITTS, N.P., a minor by and through his
26 guardian ad litem TRISHIA PITTS

24 Dated: 12/6/16

EVANS, WIECKOWSKI, WARD & SCOFFIELD, LLP

25 By: _____/s/_____
26 CAROL WIECKOWSKI
27 Attorney for Defendants,
28 ROCKLIN UNIFIED SCHOOL DISTRICT
CHARLES THIBIDEAU, BETTY JO
WESSINGER, JANNA CAMBRA, KEVIN

BROWN, ROGER STOCK, and DR. TODD CUTLER

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Dated: 12/6/16

LONGYEAR, O'DEA & LAVRA, LLP


By: _____/s/_____
GREGORY P. O'DEA
NATASHA LANGENFELD
Attorney for Defendant,
SHERRY MCDANIEL

ORDER

Pursuant to the stipulation of the parties, and good cause appearing, it is hereby ordered as follows:
Fact discovery cutoff is continued to June 30, 2017. Expert disclosure deadline is continued to September 30, 2017. The last day to file dispositive motions is continued to December 29, 2017. The deadline to file dispositive motions is continued to The Settlement Conference date remains unchanged.

IT IS SO ORDERED.

Dated: January 5, 2017


MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE