

1 Carol A. Wieckowski, Esq. (SBN 95586)  
 2 Cathleen J. Fralick, Esq. (SBN 146378)  
 3 EVANS, WIECKOWSKI, WARD & SCOFFIELD, LLP  
 4 745 University Avenue  
 5 Sacramento, CA 95825  
 6 Telephone: (916)923-1600  
 7 Facsimile: (916)923-1616  
 8 Attorneys for Defendants  
 9 ROSEVILLE CITY SCHOOL DISTRICT,  
 10 GEORGE ROOKS and JERROLD JORGENSEN

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA

13 DUANE BEECHAM, KIMBERLY ) **Case No. 2:15-CV-01022-KJM-EFB**  
 14 BEECHAM, S.Y.B., a minor by and )  
 15 through her co-guardians ad litem ) **JOINT STIPULATION AND ORDER**  
 16 DUANE BEECHAM and KIMBERLY ) **REGARDING REQUEST FOR**  
 17 BEECHAM; OLIVER VERGARA, ) **CONTINUANCE OF PRETRIAL**  
 18 JENNIFER VERGARA, E.V., a minor by ) **CONFERENCE**  
 19 and through her co-guardians ad litem )  
 20 OLIVER VERGARA and JENNIFER ) **Honorable Judge Kimberly Mueller**  
 21 VERGARA, and M.B., a minor by and )  
 22 through his guardian ad litem MANOJ ) **Final Pretrial Conference: June 1, 2018**  
 23 THOTTASSERI, )  
 24 )  
 25 Plaintiffs, )  
 26 )  
 27 vs. )  
 28 )  
 29 ROSEVILLE CITY SCHOOL DISTRICT, )  
 30 THERESA VANWAGNER, GEORGE )  
 31 ROOKS, JERROLD JORGENSEN, and )  
 32 DOES 1-30, Defendants.

---

33 **ALL PARTIES INCLUDING DEFENDANTS ROCKLIN UNIFIED SCHOOL**  
 34 **DISTRICT, GEORGE ROOKS AND JERROLD JORGENSEN, THERESA**  
 35 **VANWAGNER AND PLAINTIFFS DUANE BEECHAM, KIMBERLY BEECHAM,**  
 36 **S.Y.B., A MINOR BY AND THROUGH HER CO-GUARDIANS AD LITEM DUANE**  
 37

1 **BEECHAM and KIMBERLY BEECHAM; OLIVER VERGARA, JENNIFER**  
2 **VERGARA, E.V., A MINOR BY AND THROUGH HER CO-GUARDIANS AD LITEM**  
3 **OLIVER VERGARA AND JENNIFER VERGARA, AND M.B., A MINOR BY AND**  
4 **THROUGH HIS GUARDIAN AD LITEM MANOJ THOTTASSERI, stipulate by and**  
5 through their undersigned counsel of record to a continuance of the pretrial conference scheduled  
6 for **June 1, 2018 at 10:00 a.m.** before the Honorable Judge Kimberly Mueller. **The parties**  
7 **jointly** request the continuance for the following reasons:  
8

9 The parties have agreed to mediate the case, however due to calendar conflicts, the  
10 earliest the mediation can be scheduled is in June 2018 which would be after the pretrial  
11 conference of June 1, 2018.

12  
13 All parties are agreeable to a short continuance of the Final Pretrial Conference to **July**  
14 **13, 2018 at 10:00 a.m., with the Joint Pretrial Conference Statement due three weeks prior.**

15 Respectfully submitted,

16 Dated: May 3, 2018

17 EVANS, WIECKOWSKI, WARD  
18 & SCOFFIELD, LLP

19 By: /s/Carol A. Wieckowski

20 Carol A. Wieckowski  
21 Cathleen J. Fralick  
22 Attorneys for Defendants  
23 ROSEVILLE CITY SCHOOL  
DISTRICT, GEORGE ROOKS and  
JERROLD JORGENSEN

24 Dated: May 3, 2018

LAW OFFICES OF TODD BOLEY

25  
26 By: /s/Todd Boley

27 Todd Boley  
28 Attorney for Plaintiffs  
Duane Beecham, Kimberly Beecham,  
S.Y.B., a minor by and through her co-

guardians ad litem Duane Beecham and  
Kimberly Beecham; Oliver Vergara,  
Jennifer Vergara, E.V., a minor, by and  
through his co-guardians ad litem  
Oliver Vergara and Jennifer Vergara, M.B.,  
a minor by and through his guardian ad  
litem Manoj Thottasseri

Dated: May 3, 2018

LAW OFFICES OF PETER ALFERT

/s/ Ian A. Hansen  
PETER W. ALFERT  
IAN A. HANSEN  
Attorneys for Plaintiffs

Dated: May 3, 2018

LONGYEAR, O'DEA & LAVRA, LLP

By: /s/Natasha Langenfeld  
Greg O'Dea,  
Natasha Langenfeld  
Attorney for Defendant  
Theresa VanWagner

IT IS HEREBY ORDERED that the PreTrial Conference scheduled on June 1, 2018 at  
10:00 a.m. will be continued to July 13, 2018 at 10:00 a.m.

DATED: May 8, 2018.

  
UNITED STATES DISTRICT JUDGE