

JOHNSON SCHACHTER & LEWIS
A PROFESSIONAL LAW CORPORATION
2180 HARVARD STREET, SUITE 560
SACRAMENTO, CA 95815
TELEPHONE: (916) 921-5800 / FACSIMILE: (916) 921-0247

1 KELLIE M. MURPHY, ESQ. (SBN 245190)
2 kellie@jst-law.com
3 CRAIG A. TOMLINS, ESQ. (SBN 272678)
4 craig@jst-law.com
5 JOHNSON SCHACHTER & LEWIS
6 A Professional Law Corporation
7 Harvard Square
8 2180 Harvard Street, Suite 560
9 Sacramento, CA 95815
10 Telephone: (916) 921-5800
11 Facsimile: (916) 921-0247

12 Attorneys for DEFENDANT:
13 TERESA HAUN

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

16 ADRIANNA WORMUTH, SCOTT)
17 WORMUTH and H.W, a minor, by and)
18 through his guardians ad litem ADRIANNA)
19 WORMUTH and SCOTT WORMUTH,)
20 Plaintiffs,)
21 v.)
22 LAMMERSVILLE UNION SCHOOL)
23 DISTRICT, JAMES YEAGER, DAWN IBBS,)
24 TERESA HAUN, KIRK NICHOLAS, AND)
25 KHUSHWINDER GILL, and DOES 1-30,)
26 Defendants.)

27 **CASE NO. 2:15-cv-1572-KJM-EFB**
28 **STIPULATION AND ORDER FOR**
DISMISSAL OF PUNITIVE DAMAGE
ALLEGATIONS AGAINST DEFENDANT
TERESA HAUN

Complaint Filed: July 22, 2015
Trial Date: January 22, 2018

AND RELATED ACTION.

Plaintiffs ADRIANNA WORMUTH, SCOTT WORMUTH, and H.W., a minor, by and through his guardians ad litem ADRIANNA WORMUTH and SCOTT WORMUTH (“Plaintiffs”) and Defendant TERESA HAUN (“Haun”), by and through their attorneys of record, hereby agree and stipulate as follows:

1. Haun agrees not to seek a continuance of the trial date or any related deadlines in this matter, or of any depositions previously set in this matter (except as set forth below), based

1 on the recent substitution of new counsel on her behalf. Haun reserves the right to do so at any
2 time on other grounds if warranted.

3 2. Plaintiffs agree to reschedule Haun's deposition, currently set for May 25, 2017,
4 for a date and time agreeable to Haun and her counsel, and to coordinate dates of any further
5 depositions set by Plaintiffs with Haun's counsel.

6 3. Plaintiffs further agree to dismiss, with prejudice, all allegations against Haun
7 regarding punitive damages, including the request for punitive damages on page 14, line 25 of
8 the Amended Complaint for Damages filed on December 22, 2015, and to refrain from seeking
9 punitive damages against Haun at any time in this action.

10 IT IS SO STIPULATED.

11 Dated: May 19, 2017

JOHNSON SCHACHTER & LEWIS
A Professional Law Corporation

12
13 By: /s/ Kellie M. Murphy
14 KELLIE M. MURPHY
15 CRAIG A. TOMLINS
Attorneys for Defendant TERESA HAUN

KRAEBER LAW OFFICE

16 Dated: May 19, 2017

17
18 By: /s/ Rhonda D. Kraeber (as auth. on 5/19/17)
19 RHONDA D. KRAEBER
20 Attorneys for Plaintiffs ADRIANNA
21 WORMUTH, SCOTT WORMUTH and H.W, a
22 minor, by and through his guardians ad litem
23 ADRIANNA WORMUTH and SCOTT
24 WORMUTH

25 Dated: May 19, 2017

26 By: /s/ Todd Boley (as authorized on 5/19/17)
27 TODD BOLEY
28 ZOYA YARKYKH
Attorneys for Plaintiffs ADRIANNA
WORMUTH, SCOTT WORMUTH and H.W, a
minor, by and through his guardians ad litem
ADRIANNA WORMUTH and SCOTT
WORMUTH

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LAW OFFICES OF PETER ALFERT

Dated: May 19, 2017

By: /s/ Ian Hansen (as authorized on 5/19/17)
PETER W. ALFERT
IAN HANSEN
Attorneys for Plaintiffs ADRIANNA
WORMUTH, SCOTT WORMUTH and H.W, a
minor, by and through his guardians ad litem
ADRIANNA WORMUTH and SCOTT
WORMUTH

ORDER

Based upon the stipulation of the parties and good cause appearing, the Court orders that all allegations against Haun regarding punitive damages, including the request for punitive damages on page 14, line 25 of the Amended Complaint for Damages filed on December 22, 2015, are dismissed with prejudice, and Plaintiffs shall not be permitted to seek punitive damages against Haun at any time in this action.

IT IS SO ORDERED.

DATED: June 12, 2017


UNITED STATES DISTRICT JUDGE