

LOZANO SMITH
One Capitol Mall, Suite 640 Sacramento, CA 95814
Tel 916-329-7433 Fax 916-329-9050

1 Sloan R. Simmons, SBN 233752
ssimmons@lozanosmith.com
2 Sarah L. Garcia, State Bar No. 233814
sgarcia@lozanosmith.com
3 Carey H. Ash, State Bar No. 303872
cash@lozanosmith.com
4 LOZANO SMITH
One Capitol Mall, Suite 640
5 Sacramento, CA 95814
Telephone: (916) 329-7433
6 Facsimile: (916) 329-9050

7 Attorneys for Defendant
SACRAMENTO CITY UNIFIED
8 SCHOOL DISTRICT

9
10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 JAY T. and ANNE M.-T., individually, and as
guardian ad litem for M.M.-T.,
13
14 **Plaintiffs,**

15 vs.
16 SACRAMENTO CITY UNIFIED SCHOOL
DISTRICT,
17 **Defendant.**

Case No. 2:16-cv-00136-MCE-AC

**JOINT STIPULATION RE: BRIEFING
AND HEARING SCHEDULE; ORDER
THEREON**

18
19
20
21
22
23
24
25
26
27
28

LOZANO SMITH
One Capitol Mall, Suite 640 Sacramento, CA 95814
Tel 916-329-7433 Fax 916-329-9050

1 TO THE HONORABLE COURT:

2 IT IS HEREBY STIPULATED by and between PLAINTIFFS Jay T. and Anne M.-T.,
3 individually, and as guardian ad litem for M.M.-T. (“Plaintiffs”), through their counsel of record, and
4 DEFENDANT Sacramento City Unified School District (“District” and referred to with Plaintiffs as,
5 “Parties”), through its counsel of record, as follows:

- 6 1. The Parties agree that discovery is unnecessary and inappropriate in this action;
- 7 2. The Parties agree that in terms of both causes of action in Plaintiffs’ Complaint, the only
8 issue before the Court is Plaintiffs’ claim(s) for attorneys’ fees;
- 9 3. The Parties agree that said cause of actions and claim(s) for attorneys’ fees in Plaintiffs’
10 Complaint should be appropriately resolved via the normal process of claiming and adjudication of
11 claims for attorneys’ fees, i.e., through a motion and briefing schedule and hearing;
- 12 4. The Parties therefore agree to the following briefing and hearing schedule for resolution
13 of the merits of the causes of action and claim(s) for attorneys’ fees in Plaintiffs’ Complaint:
 - 14 a. Plaintiffs’ opening memorandum in support of an award of attorneys’ fees
15 (limited to 25 pages) and supporting papers, shall be filed on or before July 22, 2016;
 - 16 b. District’s opposition memorandum (limited to 25 pages) and supporting papers
17 shall be filed on or before August 19, 2016;
 - 18 c. Plaintiffs’ reply memorandum (limited to 15 pages) and supporting papers shall
19 be filed by no later than 14 days after the District’s opposition memorandum is filed; and
 - 20 d. That a hearing be set for September 22, 2016 on the merits of the above motion
21 papers/briefing, should the Court deem such a hearing necessary.

22 Dated: May ____, 2016

23 Respectfully submitted,
24 **RUDERMAN & KNOX, LLP**
25 /s/ Colleen A. Snyder
26 RICHARD RUDERMAN
27 COLLEEN A. SNYDER
28 Attorney for Plaintiffs Jay T. and Anne M.-T., individually
and as guardians ad litem for M.M.-T.

LOZANO SMITH
One Capitol Mall, Suite 640 Sacramento, CA 95814
Tel 916-329-7433 Fax 916-329-9050

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: May ___, 2016

Respectfully submitted,

LOZANO SMITH

/s/ Sloan R. Simmons
SLOAN R. SIMMONS
SARAH L. GARCIA
CAREY H. ASH
Attorneys for Defendant
SACRAMENTO CITY UNIFIED SCHOOLDISTRICT

ORDER


Based upon the foregoing Stipulation between PLAINTIFFS Jay T. and Anne M.-T., individually, and as guardian ad litem for M.M.-T. (“Plaintiffs”) and DEFENDANT Sacramento City Unified School District (“District”), and GOOD CAUSE APPEARING THEREFORE:

The Court hereby orders the following briefing and hearing schedule in this action:

1. Plaintiffs’ opening memorandum in support of an award of attorneys’ fees (limited to 25 pages) and supporting papers, shall be filed on or before July 22, 2016;
2. District’s opposition memorandum (limited to 25 pages) and supporting papers shall be filed on or before August 19, 2016;
3. Plaintiffs’ reply memorandum (limited to 15 pages) and supporting papers shall be filed by no later than 14 days after the District’s opposition memorandum is filed; and
4. A hearing is set for September 22, 2016 at 2:00 p.m. on the merits of the motion.

IT IS SO ORDERED.

Dated: May 17, 2016


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE