1 2 3 4 5 6 7 8	IRWIN M. ZALKIN, ESQ. (#89957) DEVIN M. STOREY, ESQ. (#234271) ALEXANDER S. ZALKIN, ESQ. (#280813) RYAN M. COHEN, ESQ. (#261313) JACQUELINE J. MCQUARRIE, ESQ. (#26731) The Zalkin Law Firm, P.C. 12555 High Bluff Drive, Suite 301 San Diego, CA 92130 Tel: 858-259-3011 Fax: 858-259-3015 Email: Irwin@zalkin.com dms@zalkin.com alex@zalkin.com ryan@zalkin.com jackie@zalkin.com jackie@zalkin.com	9)	
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11	UNITED STATES DISTRICT COURT		
12	EASTERN DISTRIC		
13	A.T., a minor, by and through his Guardian	Civil Action No: 2:16-cv-02925-MCE-DB	
14	ad Litem L.T.,	JOINT STIPULATION AND ORDER	
15	Plaintiff,	REGARDING EXTENSION OF TIME FOR RULE 26(F) DISCOVERY PLAN	
16	Timinin,	MEET AND CONFER AND WRITTEN REPORT	
17	v.		
18	DRY CREEK JOINT ELEMENTARY SCHOOL DISTRICT, PLACER COUNTY	 	
19	OFFICE OF EDUCATION, PLACER	Demand for Jury 171aij	
20	COUNTY CHILDREN SYSTEM OF CARE, and the following individuals, who		
21	are named in their individual capacities: KD ASHTON, BECKY BRAVO, PETER RALDO LIZLEE CINDY STONE		
22	BALDO, LIZ LEE, CINDY STONE, RENEE VERDUGO, MARY BOEHM,		
23	CHRISTY CARTER, WENDY DEVORE, DONNA KEARNS, LISA HEWITT,		
24	TAMMY PETERSON, STEPHANIE DILBECK, JEN ROGERS, VALERIE		
25	MILLER, DAVID MOUL, DEBBIE CANNON, JUDY BENNEY, REBECCA		
26	RATEKIN, CARLEY ROSE JACKSON, LAURI MCNALLY, SANDRA MOORE,		
27	and DOES 1-30,		
28	Defendants.		
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1	IT IS HEREBY STIPULATED, that the parties will have until after the hearing on		
2	Defendants' Motions to Dismiss, calendared for May 4, 2017 to meet and confer pursuant to		
3	Federal Rule of Civil Procedure 26(f) and submit a written report. Pursuant to the Court's		
4	Initial Pretrial Scheduling Order, the parties met and conferred on March 27, 2017. During that		
5	meeting, the parties discussed several issues including an appropriate protective order, notice		
6	correspondence pursuant to Federal Educational Rights and Privacy Act (FERPA), and a date		
7	for Initial Disclosures. Subsequently, considering the amount of parties and that several parties		
8	only recently appeared in the case, the parties agree that waiting to hold a Rule 26(f) conference		
9	until within fourteen (14) days after the passing of the May 4, 2017 hearing date, to May 18,		
10	2017, would be prudent.		
11			
12	Dated: April 11, 2017	Respectfully submitted,	
13		THE ZALKIN LAW FIRM	
14		<u>/s/ Ryan M. Cohen</u> IRWIN M. ZALKIN	
		DEVIN M. STOREY	
15		ALEXANDER S. ZALKIN RYAN M. COHEN	
16		JACQUELINE J. MCQUARRIE	
17		Attorneys for Plaintiff A.T., a minor, by and through his Guardian Ad Litem,	
18		L.T.	
19	Datadi	I OZANO SMITH	
20	Dated:	LOZANO SMITH	
21		SLOAN R. SIMMONS	
22		KRISTY J. BOYES Attorneys for Defendants	
23		DRY CREEK ELEMENTARY SCHOOL DISTRICT, PLACER COUNTY OFFICE OF EDUCATION, PETER	
24		BALDO, JUDY BENNEY, MARY BOEHM, BECKY BRAVO, DEBBIE CANNON, STEPHANIE DILLBECK,	
25		LISA HEWITT, LIZ LEE, VALERIE MILLER,	
26		SANDRA MOORE, CYNDI STONE, KD ASHTON, CHRISTY CARTER, WENDY DEVORE, DONNA KEARNS and JEN ROGERS	
27		KEAKINS AIIU JEIN KUUEKS	
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1	Dated: PLAC	ER COUNTY COUNSEL'S OFFICE
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3	JULIA Attorn	M. REEVES
4	PLAC	ER COUNTY CHILDREN'S SYSTEM OF CARE,
5	MCNA PETEI	eys for Defendants ER COUNTY CHILDREN'S SYSTEM OF CARE, E VERDUGO, DAVID MOUL, LAURI ALLY, CARLEY ROSE JACKSON, TAMMY RSON and REBECCA RATEKIN
6		ASON und REDECCH TATTERIN
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1	<u>ORDER</u>
2	Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY
3	ORDERED that the parties have until May 18, 2017 to meet and confer as required by Federal
4	Rule of Civil Procedure 26(f) regarding their discovery plan as indicated in the Court's Initial
5	Pretrial Scheduling Order (ECF No. 4).
6	IT IS SO ORDERED.
7	Dated: April 18, 2017
8	May Office
9	MORRISON C. ENGLAND, JR
10	UNITED STATES DISTRICT JUDGE
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