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Attorneys for Defendants  
DRY CREEK JOINT ELEMENTARY SCHOOL DISTRICT,  
PLACER COUNTY OFFICE OF EDUCATION, PETER BALDO,  
JUDY BENNEY, MARY BOEHM, BECKY BRAVO,  
DEBBIE CANNON, STEPHANIE DILLBECK,  
LISA HEWITT, LIZ LEE, VALERIE MILLER,  
SANDRA MOORE, CYNDI STONE, JEN ROGERS,  
CHRISTY CARTER, KATHLEEN ASHTON,  
and DONNA KEARNS

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

A.T., a minor, by and through his Guardian Ad  
Litem, L.T.,

Plaintiff,

vs.

DRY CREEK JOINT ELEMENTARY SCHOOL  
DISTRICT et al.,

Defendants.

Case No. 2:16-cv-02925-MCE-DB

**JOINT STIPULATION AND ORDER TO  
EXTEND TIME FOR EXCHANGE OF  
INITIAL DISCLOSURES**

1 Plaintiff A.T., a minor, by and through his Guardian Ad Litem, L.T. (“Plaintiff”), Individual  
2 Placer County Office of Education Defendants Peter Baldo, Judy Benney, Mary Boehm, Becky Bravo,  
3 Debbie Cannon, Stephanie Dillbeck, Lisa Hewitt, Liz Lee, Valerie Miller, Sandra Moore, Cyndi Stone,  
4 KD Ashton, Christy Carter, Donna Kearns, and Jen Rogers (“PCOE Individual Defendants”), and  
5 Individual Placer County Children’s System of Care Defendants Renee Verdugo, David Moul, Lauri  
6 McNally, Carley Rose Jackson, Tammy Peterson, Rebecca Ratekin, and Wendy Devore (“CSOC  
7 Individual Defendants” and, collectively with Plaintiff and the PCOE Individual Defendants, the  
8 “Parties”), by and through their respective counsel, stipulate and agree as follows:

9 1. WHEREAS, the Parties previously stipulated to extending the time to exchange initial  
10 disclosures until six weeks after Defendants’ filed an answer or six weeks after a hearing date for a  
11 motion to dismiss Plaintiff’s First Amended Complaint (“FAC”) (*see* ECF Doc. No. 68);

12 2. WHEREAS, Defendants’ filed their respective motions to dismiss Plaintiff’s FAC on  
13 September 18, 2017 (*see* ECF Doc. Nos. 72, 74), with a scheduled hearing date of October 19, 2017,  
14 that was subsequently vacated by the Court;

15 3. WHEREAS, based upon the Court’s vacating of the October 19, 2017 hearing date, the  
16 deadline to exchange initial disclosures under the parties prior stipulation defaulted to November 30,  
17 2017;

18 4. WHEREAS, Defendants’ motions to dismiss Plaintiff’s FAC remain pending before and  
19 under submission with the Court, and the Parties acknowledge that the Court’s ruling could result in  
20 dismissal of the subject action, in its entirety; and

21 5. WHEREAS, the Parties are interested in preventing the accrual of unnecessary costs and  
22 expenses with regard to initial disclosures, in light of the possibility that this action may be dismissed  
23 entirely, with prejudice.

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1 NOW, THEREFORE, pursuant to Rule 26 (a)(1)(C), the Parties jointly request and HEREBY  
2 STIPULATE that the deadline for initial disclosures required by Rule 26(a)(1) for this action be  
3 extended to thirty (30) days after this Court issues its rulings on Defendants' motions to dismiss the  
4 FAC. **IT IS SO STIPULATED.**

5 Dated: November 27, 2017

Respectfully submitted,

**LOZANO SMITH**

/s/ Sloan R. Simmons

SLOAN R. SIMMONS

MARCY GUTIERREZ

KRISTY J. BOYES

Attorneys for Defendants DRY CREEK JOINT  
ELEMENTARY SCHOOL DISTRICT,

PLACER COUNTY OFFICE OF EDUCATION, PETER  
BALDO, JUDY BENNEY, MARY BOEHM, BECKY  
BRAVO, DEBBIE CANNON, STEPHANIE DILLBECK,  
LISA HEWITT, LIZ LEE, VALERIE MILLER,  
SANDRA MOORE, CYNDI STONE, JEN ROGERS,  
CHRISTY CARTER, KATHLEEN ASHTON,  
and DONNA KEARNS.

15 Dated: November 27, 2017

**PLACER COUNTY COUNSEL'S OFFICE**

/s/ Julia M. Reeves

JULIA M. REEVES

Attorneys for Defendants PLACER COUNTY  
CHILDREN'S SYSTEM OF CARE, RENEE VERDUGO,  
DAVID MOUL, LAURI MCNALLY, CARLEY ROSE  
JACKSON, TAMMY PETERSON, REBECCA  
RATEKIN, and WENDY DEVORE

21 Dated: November 27, 2017

**THE ZALKIN LAW FIRM**

/s/ Ryan M. Cohen

IRWIN M. ZALKIN

DEVIN M. STOREY

ALEXANDER S. ZALKIN

RYAN M. COHEN

JACQUELINE J. MCQUARRIE

Attorneys for Plaintiff A.T., a minor, by and through  
his Guardian Ad Litem, L.T.

28 **\*Attestation: The filer of this document attests that the concurrence of the other  
signatories thereto has been obtained.**

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**ORDER**

Pursuant to the foregoing Stipulation of the Parties, and good cause appearing, IT IS HEREBY ORDERED that the deadline for the Parties to exchange initial disclosures shall be extended to thirty (30) days after the Court issues its rulings on Defendants' pending motions to dismiss Plaintiff's FAC.

IT IS SO ORDERED.

Dated: November 30, 2017

  
MORRISON C. ENGLAND, JR  
UNITED STATES DISTRICT JUDGE