

1 Jay T. Jambeck (SBN # 226018)  
 2 [jjambeck@leighlawgroup.com](mailto:jjambeck@leighlawgroup.com)  
 3 Damien B. Troutman (SBN # 286616)  
 4 [dtroutman@leighlawgroup.com](mailto:dtroutman@leighlawgroup.com)  
 5 LEIGH LAW GROUP, P.C.  
 6 870 Market Street., Suite 1157  
 7 San Francisco, CA 94102  
 8 Office: (415) 399-9155  
 9 Fax: (415) 795-3733

6 Attorneys for Plaintiff  
 7 ISAAH BROWN  
 8 SPINELLI, DONALD & NOTT  
 9 A Professional Corporation  
 10 Domenic D. Spinelli, SBN: 131192  
 11 Evan M. McLean, SBN: 309756  
 12 601 University Avenue, Suite 225  
 13 Sacramento, CA 95825  
 14 Telephone: (916) 448-7888  
 15 Facsimile: (916) 448-6888  
 16 Email: [domenics@sdnlaw.com](mailto:domenics@sdnlaw.com)

13 Attorneys for Defendant  
 14 ELK GROVE UNIFIED SCHOOL DISTRICT

14 IN THE UNITED STATES DISTRICT COURT

15 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

17 ISAAH BROWN,

18 Plaintiff,

19 vs.

20 ELK GROVE UNIFIED SCHOOL  
 21 DISTRICT,

22 Defendants.  
 23 \_\_\_\_\_/

Case No.: 2:17-CV-00396-KJM-DB

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO FILE  
 DEFENDANT’S MOTION FOR  
 SUMMARY JUDGMENT**

24 Plaintiff Isaiah Brown and Defendant Elk Grove Unified School District HEREBY  
 25 STIPULATE AND AGREE to extend the time to extend Defedant’s deadline to file its Motion for  
 26 Summary Judgment until September 11, 2019.  
 27

28 On August 13, 2019, the Court extended Defendant’s deadline to file its Motion for

1 Summary Judgment until September 6, 2019 so that Plaintiff could file a Request to Seal. (Dkt. #  
2 38).

3 Since August 13, Plaintiff's counsel has experienced major disruptions by two former  
4 clients who have filed frivolous legal actions against the Firm and its individual attorneys in state  
5 and federal court. Ms. Leigh and Mr. Troutman have separate pending civil harassment restraining  
6 order actions against one of the former clients for engaging in harassing and threatening behavior  
7 towards them, including appearing at Ms. Leigh's home without legitimate basis and attempting to  
8 use the threat of force to "arrest" Mr. Troutman and Ms. Leigh over frivolous and untrue allegations  
9 of misconduct.

10 On September 4-5, 2019, the parties met and conferred and agreed to request a short  
11 extension of Defendant's deadline to file its Motion for Summary Judgment, until September 11,  
12 2019, so that the parties could submit a Joint Request to Redact or Seal pursuant to Local Rules  
13 140-41 and the August 3, 2018 Stipulated Protective Order entered by this Court. (Dkt. # 28).

14 Per the parties' agreement, Defendant's Motion for Summary Judgment will remain  
15 scheduled for hearing on October 4, 2019.

16 Accordingly, the parties stipulate and request a short extension of Defendant's deadline to  
17 file its Motion for Summary Judgment until September 11, 2019 so that the Court has time to rule  
18 on the parties' Joint Request to Redact or Seal.

19  
20 Dated: September 5, 2019

LEIGH LAW GROUP, P.C.

21  
22 By: /s/ Damien Troutman

23 JAY T. JAMBECK  
24 DAMIEN TROUTMAN  
25 Attorneys for Plaintiff  
26 ISAIHA BROWN  
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1 Dated: September 5, 2019

SPINELLI, DONALD & NOTT

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By: /s/ Evan M. McLean

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DOMENIC D. SPINELLI

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EVAN M. McLEAN

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Attorneys for Defendant

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ELK GROVE UNIFIED SCHOOL DISTRICT

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**ORDER**

Pursuant to the parties' stipulation and good cause showing:

1. Defendant's deadline to file its Motion for Summary Judgment is September 11, 2019.

DATED: September 6, 2019.



UNITED STATES DISTRICT JUDGE