1	F. Richard Ruderman (SB No. 142226) Colleen A. Snyder (SB No. 274064)			
2	Ruderman & Knox, LLP 1300 National Drive, Suite 120			
3	Sacramento, CA 95834 Telephone: (916) 563-0100 Facsimile: (916) 563-0114			
4	rick@rudermanknox.com			
5	colleen@rudermanknox.com			
6	Attorneys for Defendants			
7				
8	UNITED STATES DISTRICT COURT			
9	FOR THE EASTERN DISTRICT OF CALIFORNIA			
10				
11	TRAVIS UNIFIED SCHOOL DISTRICT,	Case No. 2:17-cv-00808-WBS-AC		
12	Plaintiff,	JOINT STIPULATION AND REQUEST TO CONTINUE STATUS		
13	v.	CONFERENCE; [PROPOSED] ORDER		
14	DEBRA BELL, and DONALD BELL,	[I KOI OSED] OKDEK		
15	individually, and as parents on behalf of C.B., a minor,			
16	Defendants.			
17	Dolondants.			
18	IT IS HEREBY STIPULATED by and between Plaintiff Travis Unified School			
19	District and Defendants Debra Bell and Donald Bell, individually, and as parents on			
20	behalf of C.B., a minor, (collectively referred to herein as "the Parties"), through their			
21	counsel of record, as follows: 1. Defendants have filed a Motion to Dismiss and Motion to Strike ("the motions") the second and third causes of action in the Complaint;			
22				
23				
24	2. The Parties agreed through counsel that Defendants could defer filing an answer to			
25	the Complaint until the motions have been resolved;			
26	3. The Court is scheduled to hear the mo	The Court is scheduled to hear the motions on July 24, 2017, at 1:30 p.m.;		
27	4. The Status [Pretrial Scheduling] Conference is scheduled for August 14, 2017, at			
28	JOINT STIPULATION AND REQUEST TO CONTINUE STATUS CONFERENCE:			

Page 1

[PROPOSED] ORDER Case No. 2:17-CV-00808-WBS-AC

1	1:30 p.m.;	
2	5. According to the Court's Order Re: Status [Pretrial Scheduling] Conference, the	
3	Parties must meet and confer by July 24, 2017, and file a Joint Status Report by	
4	July 31, 2017;	
5	6. The Parties wish to defer discussion of a discovery plan and other pre-trial matters	
6	until after the motions have been resolved, and it is clear what claims are at issue;	
7	7. Therefore, the Parties jointly request to continue the Status [Pretrial Scheduling]	
8	Conference to Monday, October 16, 2017 at 1:30 p.m.;	
9	8. The Parties also request that all corresponding deadlines be continued accordingly.	
10		
11	Respectfully Submitted,	
12		
13	Dated: July 20, 2017	
14	/S/ COLLEEN A. SNYDER COLLEEN A. SNYDER	
15	Attorney for Defendants	
16		
17		
18	Dated: July 20, 2017	
19	/S/ MATTHEW J. TAMEL	
20	MATTHEW J. TAMEL Attorney for Plaintiff	
21	IT IS SO ORDERED.	
22		
23	The Status [Pretrial Scheduling] Conference is continued to Monday, October 23,	
24	2017 at 1:30 p.m. A Joint Status Report shall be filed no later than October 10, 2017.	
25	Dated: July 20, 2017	
26	WILLIAM B. SHUBB	
27	UNITED STATES DISTRICT JUDGE	
28	IOINT STIDIU ATION AND DECLIEST TO CONTINUE STATUS CONFEDENCE.	

JOINT STIPULATION AND REQUEST TO CONTINUE STATUS CONFERENCE; [PROPOSED] ORDER

Page 2