

DANNIS WOLIVER KELLEY
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TRAVIS UNIFIED SCHOOL DISTRICT

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12 Attorneys for Defendants and Counter-Claimants
13 C.B., DEBRA BELL, AND DONALD BELL

14 UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA
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17 TRAVIS UNIFIED SCHOOL
18 DISTRICT,

19 Plaintiff,

20 v.

21 DEBRA BELL and DONALD BELL,
individually and as parents on
22 behalf of C.B., a minor,

23 Defendants.

24 DEBRA BELL and DONALD BELL,
individually and as parents on
25 behalf of C.B., a minor,

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26 Counter-Claimants,

27 v.

28 TRAVIS UNIFIED SCHOOL
DISTRICT,

Counter-Defendant.

Case No. 2:17-CV-00808-WBS-AC

**JOINT STIPULATION AND REQUEST TO
CONTINUE DEADLINE TO SERVE
ADMINISTRATIVE RECORD;
[PROPOSED] ORDER**

Complaint Filed: April 18, 2017

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I. **STIPULATION**

Travis Unified School District ("District"), Plaintiff and Counter-Defendant, and Debra and Donald Bell, individually and as parents on behalf of C.B., a minor, Defendants and Counter-Claimants, by and through their respective counsel, stipulate as follows:

1. According to the Court's Status (Pretrial Scheduling) Order, Plaintiff shall provide Defendants a certified copy of the administrative record no later than November 15, 2017.
2. On October 30, 2017, the Parties attended court-sponsored mediation which resulted in a tentative settlement.
3. On November 2, 2017, the Parties signed a settlement agreement, which is subject to the approval of the District's Board of Education ("Board"). The Parties anticipate that the settlement agreement will be reviewed and approved by the Board at the next regularly scheduled Board meeting on November 14, 2017.
4. In the event that the Board approves the settlement, the Parties have agreed to dismiss all claims filed in this case.
5. In anticipation of settling this case, and in the interest of avoiding the unnecessary expenditure of additional time and resources, the Parties have agreed to extend the deadline to serve the administrative record.
6. The Parties therefore request that the Court continue the deadline to serve the administrative record for thirty days, to December 15, 2017, to allow the Parties time to resolve this matter.
7. The Parties agree that all other deadlines should be maintained for now, but reserve the right to seek further continuances according to the Court's rules.

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DANNIS WOLIVER KELLEY
275 BATTERY STREET, SUITE 1150
SAN FRANCISCO, CA 94111

1 Respectfully submitted:

2 DATED: November 2, 2017

DANNIS WOLIVER KELLEY

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By: /s/ Matthew J. Tamel
MATTHEW J. TAMEL
KASMIRA M. BROUGH
Attorneys for Plaintiff /
Counter-Defendant
TRAVIS UNIFIED SCHOOL DISTRICT

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8 DATED: November 6, 2017

RUDERMAN & KNOX

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By: /s/ Colleen A. Snyder
F. RICHARD RUDERMAN
COLLEEN A. SNYDER
Attorneys for Defendants and
Counter-Claimants C.B., DEBRA
BELL, AND DONALD BELL

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IT IS SO ORDERED.

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Dated: November 7, 2017


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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