1 Eugene B. Elliot, State Bar No. 111475 Roger A. Greenbaum (SBN 159450) Ethan M. Lowry, State Bar No. 278831 Roger Greenbaum Equity Law & Mediation 2 Heather G. Hensley, State Bar No. 313860 290 South Main Street, # 542 BERTRAND, FOX, ELLIOT, OSMAN & Sebastopol, CA 95473-0542 3 Telephone: (415) 779-2506 WENZEL 2749 Hyde Street E-Mail: rg@rogergreenbaum.com 4 San Francisco, California 94109 5 Telephone: (415) 353-0999 Attorney for Plaintiffs Facsimile: (415) 353-0990 RYAN ANENSON, SARAH ANENSON, 6 Email: eelliot@bfesf.com and CHRISTIAN ANENSON elowry@bfesf.com 7 hhensley@bfesf.com 8 Attorneys for Defendants 9 DIXON UNIFIED SCHOOL DISTRICT, SOLANO COUNTY SPECIAL EDUCATION 10 LOCAL PLAN AREA, and SOLANO COUNTY OFFICE OF 11 **EDUCATION** 12 13 UNITED STATES DISTRICT COURT 14 EASTERN DISTRICT OF CALIFORNIA 15 16 RYAN ANENSON; SARAH ANENSON; and Case No. 2:20-cv-00901-MCE-DB CHRISTIAN ANENSON, 17 Plaintiffs. 18 STIPULATION AND ORDER TO EXTEND v. 19 DEFENDANTS SOLANO COUNTY SPECIAL VACAVILLE UNIFIED SCHOOL DISTRICT; EDUCATION LOCAL PLAN AREA AND 20 DIXON UNIFIED SCHOOL DISTRICT: SOLANO COUNTY OFFICE OF EDUCATION'S SOLANO COUNTY SPECIAL EDUCATION TIME TO FILE RESPONSIVE PLEADING TO 21 LOCAL PLAN AREA; SOLANO COUNTY **COMPLAINT** OFFICE OF EDUCATION; and DOES 1-25, 22 inclusive, 23 Defendants. 24 Hon. Morrison C. England, Jr. 25 26 27

STIPULATION AND ORDER TO EXTEND DEFENDANTS' TIME TO FILE RESPONSIVE PLEADING Case No.: 2:20-cv-00901-MCE-DB

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Pursuant to Local Rule 144(a), Plaintiffs RYAN ANENSON, SARAH ANENSON, and CHRISTIAN ANENSON, and Defendants SOLANO COUNTY SPECIAL EDUCATION LOCAL PLAN AREA ("SELPA"), and SOLANO COUNTY OFFICE OF EDUCATION ("SCOE"), by and through their respective attorneys of records, do hereby stipulate to extend the time for Defendants SELPA and SCOE ("Defendants") to respond to the Complaint in the above captioned matter to September 11, 2020.

Plaintiffs and Defendants had previously agreed that responsive pleadings on behalf of Defendants would be due September 4, 2020. On September 2, 2020, counsel for Defendants requested that Plaintiff dismiss those entities without prejudice. Plaintiffs' counsel is considering this request, and in the interest of conserving the resources of the Court and the parties, the parties have stipulated to continue by 7 days the date on which responsive Pleadings on behalf of Defendants are due. The Parties hope that this may result in avoiding an unnecessary motion to dismiss and/or strike on the issue of Defendants' viability as parties to the action

The Plaintiffs and Defendants hereby stipulate and join in respectfully requesting that this Court approve September 11, 2020, as the due date for responsive pleading by Defendants SELPA and SCOE.

IT IS SO STIPULATED.

Dated: September 4, 2020 ROGER GREENBAUM EQUITY LAW & MEDIATION

By: <u>/s/ Robert A. Greenbaum</u> Roger A. Greenbaum

> Attorneys for Plaintiffs RYAN ANENSON, SARAH ANENSON, and CHRISTIAN ANENSON

Dated: September 4, 2020 BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: ______/s/Ethan M. Lowry

Eugene B. Elliot
Ethan M. Lowry
Heather G. Hensley
Attorneys for Defendant
DIXON UNIFIED SCHOOL DISTRICT, SOLANO
COUNTY SPECIAL EDUCATION LOCAL PLAN
AREA, and SOLANO COUNTY OFFICE OF

EDUCATION

ATTORNEY ATTESTATION I, Ethan M. Lowry, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local Rule 131(e), I hereby attest that concurrence in the filing of these documents has been obtained from each of its Signatories. Dated: September 4, 2020 /s/ Ethan M. Lowry Ethan M. Lowry **ORDER** SOLANO COUNTY SPECIAL EDUCATION LOCAL PLAN AREA and SOLANO COUNTY OFFICE OF EDUCATION's responsive pleading to the Complaint is due September 11, 2020. IT IS SO ORDERED. Dated: September 14, 2020 MORRISON C. ENGLAND, JR SENIOR UNITED STATES DISTRICT JUDGE