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6 Attorneys for DEFENDANT:
 7 TRACY UNIFIED SCHOOL DISTRICT

8 **UNITED STATES DISTRICT COURT**
 9 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

10
 11 CHRISTOPHER CRONE,

12 Plaintiff,

13
 14 v.

15 TRACY UNIFIED SCHOOL DISTRICT and
 16 BRIAN STEPHENS, an individual,

17 Defendants.

CASE NO. 2:20-cv-01451-JAM-AC

**STIPULATION TO MODIFY
 SCHEDULING ORDER; ORDER**

Complaint Filed: July 20, 2020
 Trial Date: July 24, 2023

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 21 Pursuant to Local Rule 144, Plaintiff Christopher Crone (“Plaintiff”) and Defendant
 22 Tracy Unified School District (“the District”) (collectively “the Parties”), by and through their
 23 attorneys of record,¹ hereby stipulate as follows:

24 WHEREAS, on November 8, 2021, this Court issued a Scheduling Order [ECF No. 17]
 25 in this matter, a portion of which was changed by Minute Order dated November 17, 2021.

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¹ The only claim alleged against Defendant Brian Stephens was dismissed with prejudice by Order dated December 7, 2020 [ECF No. 13]; accordingly, the only remaining parties are Plaintiff and the District.

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1 WHEREAS, the Parties have proceeded and are proceeding with discovery, including
2 written discovery recently propounded by Plaintiff and Plaintiff's deposition scheduled for
3 December 5, 2022.

4 WHEREAS, the Parties desire to discuss possible resolution of the matter after
5 completion of the discovery outlined above, including a possible mediation, and defer additional
6 discovery to avoid incurring additional fees and costs that may not be necessary.

7 WHEREAS, the Parties believe that a Settlement Conference, scheduled in the next three
8 to four months, would be beneficial in the event the Parties' efforts at resolution are not
9 successful.

10 WHEREAS, in light of the above, the Parties believe that an approximate three month
11 extension of the deadlines previously set is reasonable and necessary. No prior extensions of
12 these deadlines have been sought.

13 THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by the Parties that
14 the Scheduling Order [ECF No. 17] be modified as follows (or with dates after those set forth
15 below that are convenient for the Court):

16 DISPOSITIVE MOTION FILING DEADLINE: June 9, 2023 (continued from
17 3/10/2023);

18 DISPOSITIVE MOTION HEARING: July 25, 2023 (continued from 4/25/2023)

19 DISCOVERY: April 27, 2023 (continued from 1/27/2023)

20 EXPERT WITNESS DISCLOSURES: February 17, 2023 (continued from 11/18/2022)

21 SUPPLEMENTAL/REBUTTAL EXPERT WITNESS DISCLOSURES: March 9, 2023
22 (continued from 12/9/2022)

23 FINAL PRETRIAL CONFERENCE: September 11, 2023 (continued from 6/9/2023)

24 TRIAL: November 6, 2023 (continued from 7/24/2023)

25 [SIGNATURES ON FOLLOWING PAGE]
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1 IT IS SO STIPULATED.

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3 Dated: November 18, 2022

JOHNSON SCHACHTER & LEWIS
A Professional Law Corporation

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5

/s/ Kellie M. Murphy
KELLIE M. MURPHY

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7

8 Dated: November 18, 2022

LEIGH LAW GROUP, P.C.

9

10 /s/ Jay T. Jambeck (authorized on 11/18/22)
JAY T. JAMBECK

11

12

ORDER

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PURSUANT TO THE STIPULATION AND GOOD CAUSE APPEARING, the

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Court Orders that the dates set forth in the Scheduling Order previously issued in this case on

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November 8, 2021 shall be modified as follows:

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DISPOSITIVE MOTION FILING DEADLINE: June 9, 2023;

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DISPOSITIVE MOTION HEARING: July 25, 2023 at 1:30 p.m.;

18

EXPERT DISCOVERY: April 27, 2023;

19

EXPERT WITNESS DISCLOSURES: February 17, 2023;

20

SUPPLEMENTAL/REBUTTAL EXPERT WITNESS DISCLOSURES: March 9, 2023;

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FINAL PRETRIAL CONFERENCE: September 22, 2023 at 11:00 a.m.; and

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TRIAL: November 6, 2023 at 9:00 a.m.

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This matter is REFERRED to Magistrate Judge Jeremy D. Peterson for settlement

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proceedings. The parties shall contact Judge Peterson's Courtroom Deputy to obtain available

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dates for a settlement conference.

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IT IS SO ORDERED.

Dated: November 18, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE