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9 Attorneys for Plaintiffs
10 Joscelyn Reid
E.R., a minor, by Aja Moody

11 UNITED STATES DISTRICT COURT
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13 EASTERN DISTRICT OF CALIFORNIA
14
15 SACRAMENTO

15 Joscelyn Reid, and E.R., by his guardian ad
16 litem Aja Moody
17 Plaintiffs,
18 v.
19 Colusa County Office of Education, and Raul
20 Rivera
21 Defendants.

No. 2:24-CV-01267-JAM-AC

**STIPULATION TO EXTEND EXPERT
DISCOVEY DEADLINES**

Judge: Hon. John A. Mendez
Magistrate: Hon. Allison Claire
Courtroom: 6, 14th Floor

Complaint Filed: February 1, 2024

Trial Date: March 2, 2026

23 TO THIS HONORABLE COURT:

24 Defendants Colusa County Office of Education, and Raul Rivera (“Defendants”) and
25 Plaintiffs Joscelyn Reid, and E.R., by his guardian ad litem Aja Moody (“Plaintiffs”) by and
26 through their respective counsel of record, hereby enter into the following Stipulation to extend
27

1 the dates of Expert Designation, Rebuttal Experts and Expert Discovery. This is the first request
2 for an extension of Discovery. Good cause exists for such extension.

3 Jury Trial is 2 March 2026. The expert designation date is 30 May 2025. Rebuttal expert
4 designation is 13 June 2025. Discovery Cut-Off is 25 July 2025.

5 Plaintiffs wish to designate an expert witness whose schedule does not allow production
6 of a Rule 26 report until mid-July 2025. Plaintiffs learned about this delay in the late afternoon
7 on May 16, 2025. Plaintiffs have only recently (in the last two months) identified the expert,
8 who may be able to assist the jury in reaching a just and reasonable verdict, and in addition to
9 the expert's schedule, plaintiffs are constrained in cooperating with the expert because of
10 plaintiff E.R.'s incarceration in a juvenile facility in Colorado.

11 No party will suffer prejudice because of the extension to which the parties hereby
12 stipulate. The stipulated dates begin 231 days before the jury trial, and it is respectfully
13 requested that the Court enter the Proposed Order under the terms of this stipulation.

14 **STIPULATION**

15 By this joint stipulation, the parties agree that:

- 16 1. The parties agree to extend expert designations to 14 July 2025
17 2. The parties agree to extend rebuttal expert designations to 29 July 2025
18 3. The parties agree to extend expert discovery to 8 September 2025.

19 **IT IS SO STIPULATED**

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21 DATED: 5/21/2025

TOM PAOLI, TRIAL LAWYER

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23 By: /s/ Tom Paoli
24 Tom Paoli
25 Attorneys for PLAINTIFFS
26 Joscelyn Reid
27 E.R. by Aja Moody

1 DATED: 5/21/2025

GOODROW LAW OFFICE

2 By: /s/ Russell L. Goodrow

3 Russell L. Goodrow

4 Attorneys for PLAINTIFFS

5 Joscelyn Reid

E.R. by Aja Moody

6 DATED: 5/21/2025

DIEPENBROCK & COTTER, LLP

7 By: /s/ John P. Cotter

8 John P. Cotter

9 Attorneys for DEFENDANTS

Colusa County Office of Education

10 Raul Rivera

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No. 2:24-cv-01267-JAM-AC

**ORDER EXTENDING EXPERT
DISCOVERY DEADLINES**

Judge: Hon. John A. Mendez

1 The Court having reviewed the Stipulation to Extend Expert Discovery Deadlines,
2 and for good cause shown,

3 **IT IS SO ORDERED** that the Stipulation filed by the parties in *Reid, et al. v.*
4 *Colusa County Office of Education, et al.* (2:24-CV-01267) is granted. The Court enters
5 the following Order under its terms:
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7 1. The May 30, 2025 Designation of Experts is now RESET for **July 14, 2025.**

8 2. The June 13, 2025 Rebuttal Experts is now RESET for **July 29, 2025.**

9 3. The July 25, 2025 Discovery Cut-Off for Expert Discovery is now RESET for
10 **September 8, 2025.**
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12 4. All other dates, deadlines, and instructions contained in the October 28, 2024
13 Pretrial Scheduling Order (ECF No. 19), shall remain in effect.
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17 Dated: May 22, 2025

/s/ John A. Mendez

18 THE HONORABLE JOHN A. MENDEZ
19 SENIOR UNITED STATES DISTRICT JUDGE
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