EDMUND G. BROWN JR. Attorney General of the State of California SUSAN M. CARSON Supervising Deputy Attorney General GEORGE PRINCE, State Bar No. 133877 Deputy Attorney General 455 Golden Gate Avenue, Suite 11000 4 San Francisco, CA 94102-7004 5 Telephone: (415) 703-5749 Fax: (415) 703-5480 6 7 Attorneys for State Defendants 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 C 96-4179 TEH EMMA C., 12 13 Plaintiff. **ALL PARTIES' REQUEST** FOR AN EXTENSION OF TIME TO IN WHICH TO 14 v. FILE A STIPULATION RE: 15 DELAINE EASTIN, ET AL., PLAN FOR PROVISION OF **COMPENSATORY** Defendant. **SERVICES; STIPULATION** 16 AND (PROPOSED) ORDER **THEREON** 17 18 19 20 In accordance with this Court's January 22, 2009 Order Regarding Request for Extension of Time (Document 1362, at p. 2: 2-4), the parties to this action have met and 21 conferred to draft a new plan as to how the California Department of Education (CDE) will 22 23 comply with the Court's orders to provide compensatory services to the students of the Ravenswood City School District (District). 24 25 Following review of and discussion regarding a draft plan created and circulated by CDE, the parties are in agreement that the draft can form the basis of a plan that will be 26 27 acceptable to all parties, and are working in concert to revise the document for that purpose. However, the parties are also in agreement that a comprehensive final plan will not be ready for Parties' Request for EOT re: Plan for Comp. Ed. Services Plan; [proposed] Order Emma C. v. Delaine Eastin, et al. C96-4179 TEH

filing with the Court by February 5, 2009, the date set by the Court for such a filing. 2 Accordingly, and in light of the agreement in principle and the parties' willingness to 3 continue the work necessary to finalize the details, the parties hereby respectfully stipulate and request that the Court grant them an additional seven calendar days -- to and through February 5 12, 2009 -- in which to file the new plan in the form of a stipulation. Dated: February 4, 2009 6 Respectfully submitted, 7 YOUTH & EDUCATION LAW PROJECT 8 MILLS LEGAL CLINIC, STANFORD LAW SCHOOL 9 /s/ William Koski 10 Attorneys for Plaintiffs 11 12 EDMUND G. BROWN JR. Attorney General of the State of California 13 /s/ George Prince 14 GEORGE PRINCE, Deputy Attorney General 15 Attorneys for State Defendants 16 17 MICHAEL P. MURPHY, COUNTY COUNSEL 18 /s/ Eugene Whitlock, Deputy County Counsel 19 Attorneys for Ravenswood City School District 20 21 22 23 **GENERAL ORDER 45 ATTESTATION** 24 I, George Prince, am the ECF user whose ID and password are being used to file this request. In compliance with General Order 45, X.B., I hereby attest that William Koski of the 25 Youth & Education Law Project and Eugene Whitlock of the San Mateo County Counsel's Office have concurred in the filing of this document with their electronic signatures. 26 Dated: February 4, 2009 /s/ George Prince 27 George Prince 28

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[PROPOSED] ORDER

The Court has reviewed the parties' request that the Court grant them an additional seven calendar days -- to and through February 12, 2009 -- in which to file a stipulated plan regarding the provision of compensatory services in accord with the Court's January 22, 2009 Order.

For good cause shown, the parties' request is for an extension of time is granted.

IT IS SO ORDERED



Parties' Request for EOT re: Plan for Comp. Ed. Services Plan; [proposed] Order