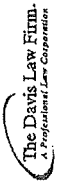


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4 San Francisco, California 94105  
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6 Attorneys for Defendants ANTIOCH UNIFIED  
7 SCHOOL DISTRICT, BOARD OF EDUCATION  
OF ANTIOCH UNIFIED SCHOOL DISTRICT,  
8 DR. DONALD GILL, KAI MONTGOMERY,  
KAREN MATES, WENDY AGHILY, TOBINWORLD,  
9 MIKE WILLIAMS, SARA FORGHANI,  
TERESA TURNER, CHEREE MOSLEY,  
10 ASHLEY CURTIN, and STEPHANIE BROWN

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14  
15 ADRIANNE PANTELL, as Guardian ad Litem of  
DP, a minor,

16 Plaintiff,

17 vs.

18  
19 ANTIOCH UNIFIED SCHOOL DISTRICT;  
20 BOARD OF EDUCATION OF ANTIOCH  
UNIFIED SCHOOL DISTRICT; DR.  
21 DONALD GILL, individually and in his official  
22 capacity as Superintendent of Antioch Unified  
School District; DAVID WAX, an individual and  
23 in his official capacity as former Director of  
Special Education for Antioch Unified School  
24 District; KAI MONTGOMERY, an individual  
and in her official capacity as former  
25 Coordinator or Special Education; KAREN  
MATES, individually and in her official  
26 capacity as Director of Special Education for  
Antioch Unified School District; WENDY  
27 AGHILY, individually and in her official

Case No. C 14-01381 KAW

**STIPULATION AND ~~PROPOSED~~ ORDER  
RE: EXTENSION OF TIME FOR CERTAIN  
DEFENDANTS TO RESPOND TO  
COMPLAINT; AND FOR EXTENSION OF  
CASE DEADLINES SPECIFIED IN ORDER  
SETTING INITIAL CASE MANAGEMENT  
CONFERENCE AND ADR DEADLINES  
(Doc. 4)**

STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR CERTAIN DEFENDANTS TO RESPOND TO COMPLAINT; AND FOR EXTENSION OF CASE DEADLINES SPECIFIED IN ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES (Doc. 4)

1 capacity as Program Specialist for Contra Costa  
2 SELPA; TOBINWORLD, a non-profit entity  
3 doing business as a California certified nonpublic  
4 school; MIKE WILLIAMS, individually and in his  
5 official capacity as Vice President and Behaviorist  
6 for Tobinworld; SARA FORGHANI, individually  
7 and in her official capacity as Principal of  
8 Tobinworld; TERESA TURNER, individually and  
9 in her official capacity as Teacher at Tobinworld;  
10 CHEREE MOSLEY, individually and in her  
11 official capacity as Teacher's Aide at Tobinworld;  
12 ASHLEY CURTIN, individually and in her  
13 official capacity as Teacher's Aide at Tobinworld,  
14 STEPHANIE BROWN, individually and in her  
15 official capacity as Teacher's Aide at Tobinworld  
16 and DOES 1-10 inclusive,

11 Defendants.

12  
13 Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF  
14 ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN  
15 MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA  
16 TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN having been served  
17 with process in this case in May 2014, the parties desire to permit additional time for:

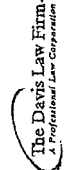
18 1. Defendants and their counsel to conduct fact investigation prior to responding to the  
19 Complaint; and

20 2. The parties to engage in am informal, preliminary case discussions.

21 Accordingly, IT IS HEREBY STIPULATED between ANDREA M. TYTELL, counsel to  
22 Plaintiff ADRIANNE PANTELL, as Guardian ad Litem of DP, a minor, and TIMOTHY J. DAVIS,  
23 Counsel to Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF  
24 ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN  
25 MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA  
26 TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN, that:

27 ///

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1. The date for Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN to respond to Plaintiff's March 26, 2014 Complaint for Damages is extended to June 15, 2014; and

2. The dates specified in this Court's Order Setting Initial Case Management Conference and ADR Deadlines, dated March 26, 2014 (Doc. 4) be extended as follows:

EVENT	ORIGINAL DATE	EXTENDED DATE
Last day to: · meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan · file ADR Certification signed by Parties and Counsel (form available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> ) · file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference (form available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> )	June 3, 2014	July 15, 2014
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contents of Joint Case Management Statement (also available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> )	June 17, 2014	July 29, 2014
INITIAL CASE MANAGEMENT CONFERENCE (CMC) in Courtroom 4, 3rd floor at 1:30 PM	June 24, 2014 1:30 p.m. Courtroom 4 3 <sup>rd</sup> Floor	August 5, 2014 1:30 p.m. Courtroom 4 3 <sup>rd</sup> Floor

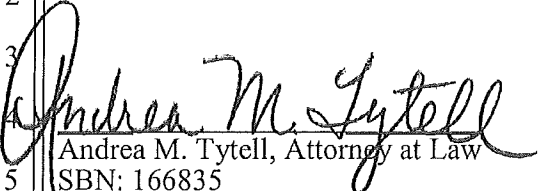
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The Davis Law Firm.  
A Professional Law Corporation

1 Dated: May 27, 2014.

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Andrea M. Tytell, Attorney at Law  
SBN: 166835  
LAW OFFICES OF ANDREA M. TYTELL  
2121 Rosecrans Avenue, Suite 1350  
El Segundo, California 90245  
Telephone: (310) 416-9710  
Attorneys for Plaintiff  
ADRIANNE PANTELL, AS GUARDIAN AD  
LITEM OF DP, A MINOR

Dated: May 27, 2014.

THE DAVIS LAW FIRM

By: 

TIMOTHY C. DAVIS  
Attorneys for Defendants  
ANTIOCH UNIFIED SCHOOL DISTRICT,  
BOARD OF EDUCATION OF ANTIOCH  
UNIFIED SCHOOL DISTRICT, DR.  
DONALD GILL, KAI MONTGOMERY,  
KAREN MATES, WENDY AGHILY,  
TOBINWORLD, MIKE WILLIAMS, SARA  
FORGHANI, TERESA TURNER, CHEREE  
MOSLEY, ASHLEY CURTIN, and  
STEPHANIE BROWN

**~~PROPOSED~~ ORDER**

The parties having so stipulated, and good cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The date for Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN to respond to Plaintiff's March 26, 2014 Complaint for Damages is extended to June 15, 2014; and

2. The dates specified in this Court's Order Setting Initial Case Management Conference and ADR Deadlines, dated March 26, 2014 (Doc. 4) are extended as follows:

EVENT	ORIGINAL DATE	EXTENDED DATE
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· file ADR Certification signed by Parties and Counsel (form available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> )		
· file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference (form available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> )		
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contents of Joint Case Management Statement (also available at <a href="http://cand.uscourts.gov">cand.uscourts.gov</a> )	June 17, 2014	July 29, 2014
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IT IS SO ORDERED.

Date: 6/2/14

  
\_\_\_\_\_  
Hon. Kandis A. Westmore  
UNITED STATES MAGISTRATE JUDGE