Ethan M. Lowry, State Bar No. 278831
Wilson Lau, State Bar Number 307151
BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
2749 Hyde Street
San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990
Email: elowry@bfesf.com
wlau@bfesf.com

Attorneys for Defendant
FAIRFIELD−SUISUN UNIFIED SCHOOL DISTRICT

SPECIAL EDUCATION COLLABORATION PROJECT
EVAN GOLDSEN, Bar No. 257775
CARLY CHRISTOPHER, Bar No. 278795
4275 Alta Vista Ct.
Oceanside, CA 92057
Telephone: 562.544.6077
Fax: 415.276.1845
Email: cc@specialedcollaboration.net
eg@specialedcollaboration.net

Attorneys for Plaintiff, A.O.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

A.O., by and through his parent and guardian ad litem, T.O. and M.O. individually, Plaintiff, v. FAIRFIELD−SUISUN UNIFIED SCHOOL DISTRICT, ERICA RESENDEZ, COLLEEN HUTCHINSON, DOROTHY ROTHENBAUM, ANGIE AVLONITIS, KRIS COREY, and DOES 1-10; all in their individual and official capacities, Defendants.	Case No. 2:22-cv-01416-DJC-AC **STIPULATION AND ORDER TO EXTEND FACT AND EXPERT DISCOVERY DEADLINES** **Hon. Daniel J. Calabretta**

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Pursuant to Local Rule 144(a), Plaintiff A.O. by and through his parent and general guardian, T.O. and M.O., and Defendant FAIRFIELD−SUISUN UNIFIED SCHOOL DISTRICT, ("DEFENDANT"), by and through their attorneys of record, do hereby stipulate to extend pre-trial deadlines and trial schedule in the above captioned matter.

On May 16, 2023, the Court issued a Scheduling Order for the pre-trial deadlines in the above captioned matter.

The Parties worked diligently to conduct discovery and comply with the Court's Scheduling Order but were unable to resolve issues related to the depositions of Plaintiff and his mother. The Parties were unable to resolve the issues through meet and confer efforts. As such, the Parties sought an informal discovery conference with Judge Allison Claire, which occurred on December 18, 2023.

Due to the Parties' meet and confer efforts and the Parties' limited availability, the Parties are unable complete discovery by January 19, 2024, as ordered.

The Parties stipulate that continuing the pre-trial deadlines and trial date will not prejudice the Parties.

The Parties agree to continue the following pre-trial deadlines and trial schedule, which was proposed by the Court on January 17, 2024:

Fact Discovery Cutoff Date:	4/18/2024;
Expert Disclosure Deadline:	5/16/2024;
Supplemental Disclosure Deadline:	6/13/2024;
Expert Discovery Cutoff Date:	7/11/2024;
Dispositive Motion Filing Deadline:	9/20/2024;
Dispositive Motion Hearing:	11/14/2024 at 1:30 PM;
Final Pretrial Conference:	1/30/2025 at 1:30 PM; and
Jury Trial	3/24/2025 at 9:00 AM.

The Parties hereby stipulate and join in respectfully requesting that this Court approve the above proposed pre-trial deadlines and trial schedule.

IT IS SO STIPULATED.

Dated: January 18, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: */s/ Wilson Lau*
Ethan M. Lowry
Wilson Lau
Attorneys for Defendant
FAIRFIELD-SUISUN UNIFIED SCHOOL DISTRICT

Dated: January 18, 2024

SPECIAL EDUCATION COLLABORATION PROJECT

By: */s/ Carly Christopher*
Carly Christopher
Evan B. Goldsen
Attorneys for Plaintiff A.O.

ATTORNEY ATTESTATION

I, Wilson Lau, 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: January 18, 2024

By: */s/ Wilson Lau*
Wilson Lau

ORDER

Based upon the stipulation of the Parties and good cause appearing, the Court orders as follows:

Fact Discovery Cutoff Date:	4/18/2024;
Expert Disclosure Deadline:	5/16/2024;
Supplemental Disclosure Deadline:	6/13/2024;
Expert Discovery Cutoff Date:	7/11/2024;
Dispositive Motion Filing Deadline:	9/20/2024;
Dispositive Motion Hearing:	11/14/2024 at 1:30 PM;
Final Pretrial Conference:	1/30/2025 at 1:30 PM; and
Jury Trial	3/24/2025 at 9:00 AM.

IT IS SO ORDERED.

Dated: January 19, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE