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 parents and guardians ad litem, T.O. and M.O., and defendant FAIRFIELD−SUISUN UNIFIED SCHOOL DISTRICT ("DISTRICT"), by and through their attorneys of record, do hereby stipulate to extend pre-trial deadlines in the above captioned matter.

On January 19, 2024, the Court issued an Order for the pre-trial deadlines in the above captioned matter.

The Parties worked diligently to conduct discovery and comply with the Court's Order but were unable to complete discovery due to some unforeseen circumstances including illness of a deponent and the coordination of Plaintiff's mental health examination. The Parties are meeting and conferring to reschedule the outstanding depositions which includes Plaintiff's continued deposition, Plaintiff's father, and two employees of the DISTRICT as well as the coordination of Plaintiff's mental health examination, which includes a psychiatric interview and psychological testing. The Parties are optimistic to resolve said discovery issues informally without judicial intervention. Due to the aforementioned issues, the Parties are unable to complete discovery by April 18, 2024, as ordered.

The Parties stipulate that continuing the pre-trial deadlines will not prejudice any party. The proposed continued pre-trial deadlines will also allow the Parties to attend private mediation. The Parties have agreed to attend private mediation during the summer of 2024.

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

Fact Discovery Cutoff Date:	8/16/2024;
Joint Mid-Discovery Statement:	3/29/2024;
Expert Disclosure Deadline:	9/13/2024;
Supplemental Disclosure Deadline:	10/11/2024;
Expert Discovery Cutoff Date:	11/8/2024;
Dispositive Motion Filing Deadline:	1/17/2025;
Dispositive Motion Hearing:	3/6/2025 at 1:30 PM;
Final Pretrial Conference:	5/22/2025 at 1:30 PM; and
Jury/Bench Trial	7/14/2025 at 9:00 AM.

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

IT IS SO STIPULATED.

Dated: April 18, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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

Dated: April 18, 2024

SPECIAL EDUCATION COLLABORATION PROJECT

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

ATTORNEY ATTESTATION

I, Ethan M. Lowry, 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: April 18, 2024

By: */s/ Ethan M. Lowry*
Ethan M. Lowry

ORDER

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

Fact Discovery Cutoff Date:	8/16/2024;
Joint Mid-Discovery Statement:	3/29/2024;
Expert Disclosure Deadline:	9/13/2024;
Supplemental Disclosure Deadline:	10/11/2024;
Expert Discovery Cutoff Date:	11/8/2024;
Dispositive Motion Filing Deadline:	1/17/2025;
Dispositive Motion Hearing:	3/6/2025 at 1:30 PM;
Final Pretrial Conference:	5/22/2025 at 1:30 PM; and
Jury/Bench Trial	7/14/2025 at 9:00 AM.

IT IS SO ORDERED.

Dated: April 19, 2024

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