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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 August 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 issues with the coordination of Plaintiff's mental health examination, which includes a psychiatric interview and psychological testing. The Parties are meeting and conferring to set Plaintiff's mental health examination as well as reschedule outstanding depositions, including Plaintiff's continued deposition, Plaintiff's mother's continued deposition, Plaintiff's father, Plaintiff's medical providers, and Plaintiff's educators. The Parties are optimistic to resolve said discovery issues informally without judicial intervention. Moreover, the Parties are working to schedule a mediation after Plaintiff's mental health examination in an attempt to resolve this matter. Due to the aforementioned issues, the Parties are unable to complete discovery by August 16, 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 towards the end of 2024.

The Parties agree to continue the following pre-trial deadlines and trial schedule, which was proposed by the Court on August 6, 2024:

Fact Discovery Cutoff Date:	12/20/2024;
Expert Disclosure Deadline:	1/20/2025;
Supplemental Disclosure Deadline:	2/20/2025;
Expert Discovery Cutoff Date:	3/20/2025;
Dispositive Motion Filing Deadline:	5/23/2025;
Dispositive Motion Hearing:	7/10/2025 at 1:30 PM;
Final Pretrial Conference:	10/9/2025 at 1:30 PM; and
Jury/Bench Trial	12/1/2025 at 8:30 AM.

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

IT IS SO STIPULATED.

Dated: August 6, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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

Dated: August 6, 2024

SPECIAL EDUCATION COLLABORATION PROJECT

By: *Evan Goldsen*
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: August 6, 2024

By: */s/ Wilson Lau*
Wilson Lau

ORDER

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

Fact Discovery Cutoff Date:	12/20/2024;
Expert Disclosure Deadline:	1/20/2025;
Supplemental Disclosure Deadline:	2/20/2025;
Expert Discovery Cutoff Date:	3/20/2025;
Dispositive Motion Filing Deadline:	5/23/2025;
Dispositive Motion Hearing:	7/10/2025 at 1:30 PM;
Final Pretrial Conference:	10/9/2025 at 1:30 PM; and
Jury/Bench Trial	12/1/2025 at 8:30 AM.

IT IS SO ORDERED.

Dated: August 7, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA

UNITED STATES DISTRICT JUDGE