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 August 7, 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. Based on the mediator's limited availability, the Parties have agreed to and scheduled private mediation for January 23, 2025. The Parties further agreed to postpone outstanding discovery until after mediation to allow the Parties the best opportunity to informally resolve this matter without judicial intervention. If the matter does not resolve at mediation, the outstanding discovery includes Plaintiff's continued deposition, Plaintiff's mother's continued deposition, Plaintiff's father, Plaintiff's medical providers, and Plaintiff's educators. Due to the aforementioned issues, the Parties are unable to complete discovery by December 20, 2024, as ordered.

The Parties stipulate that continuing the pre-trial deadlines will not prejudice any party. The proposed continued pre-trial deadlines will allow the Parties to attend private mediation on January 23, 2025.

The Parties agree to continue the following pre-trial deadlines and trial schedule, which was proposed by the Court on December 10, 2024:

Fact Discovery Cutoff Date:	6/20/2025;
Expert Disclosure Deadline:	7/21/2025;
Supplemental Disclosure Deadline:	8/21/2025;
Expert Discovery Cutoff Date:	9/22/2025;
Dispositive Motion Filing Deadline:	11/24/2025;
Dispositive Motion Hearing:	1/22/2026 at 1:30 PM;
Final Pretrial Conference:	4/23/2026 at 1:30 PM; and
Jury/Bench Trial	6/22/2026 at 8:30 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: December 12, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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

Dated: December 12, 2024

SPECIAL EDUCATION COLLABORATION PROJECT

By: */s/ Evan B. 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: December 12, 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:	6/20/2025;
Expert Disclosure Deadline:	7/21/2025;
Supplemental Disclosure Deadline:	8/21/2025;
Expert Discovery Cutoff Date:	9/22/2025;
Dispositive Motion Filing Deadline:	11/24/2025;
Dispositive Motion Hearing:	1/22/2026 at 1:30 PM;
Final Pretrial Conference:	4/23/2026 at 1:30 PM; and
Jury/Bench Trial	6/22/2026 at 8:30 AM.

IT IS SO ORDERED.

Dated: December 13, 2024

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