1 2 3 4 5 6 7 8 9	1006 Fourth Street, Eighth Floor Sacramento, CA 95814-3326 Telephone: (916) 446-9292 Attorneys for TWIN RIDGES ELEMENTARY SCHOOL DISTRICT		
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11	UNITED STATES DISTRICT COURT		
12	EASTERN DISTRICT OF CALIFORNIA		
13			
14	PLANS, Inc.,	Case No. CIV. S-98-0266 FCD PAN	
15	Plaintiffs,	Date: April 1, 2005 Time: 10:00 a.m.	
	v.)	Place: Courtroom 2	
16 17	SACRAMENTO CITY UNIFIED SCHOOL) DISTRICT, TWIN RIDGES ELEMENTARY) SCHOOL DISTRICT, DOES 1-100,)	DEFENDANTS' JOINT NOTICE OF MOTIONS IN LIMINE	
18) Defendants.		
19)		
20	PLEASE TAKE NOTICE that on April 1, 2005, at 10:00 a.m., or as soon thereafter as the		
21	matter may be heard in the above-entitled court, located at 501 I Street, Courtroom Number 2,		
22	Sacramento, California, at the direction of the Court ¹ Defendants TWIN RIDGES ELEMENTARY		
23	SCHOOL DISTRICT and SACRAMENTO CITY UNIFIED SCHOOL DISTRICT (hereafter		
24	collectively "Districts" or "Defendants"), pursuant to Federal Rules of Evidence, rule 104, will move		
25	the Court to grant the following motions in limine:		
26			
27	¹ Defendants file these motions in limine pursuant to the Court's direction at the February		
28	2005, pretrial conference. Defendants will file further motions in limine as appropriate prior to trial, the heard the first day of trial.		
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1	11.	Motion in Limine to Exclude	e Testimony by Witnesses not Previously Disclosed;
2	 12. Motion in Limine to Exclude Exhibits Not Previously Disclosed or Produced; 		
3	 Motion in Limine to Exclude Experts Not Properly Disclosed by Plaintiff. 		
4			the Court at the in limine hearing to exclude and limit
5	evidence at trial based upon the Federal Rules of Civil Procedure and Federal Rules of Evidence. The		
6	motions will be based upon this notice of motion, the motions filed herewith, the declaration of		
7	Michelle L. Cannon, and the pleadings and papers filed herein.		
8			Respectfully submitted,
9			GIRARD & VINSON, LLP
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11		1 11 0002	
12	DATED: Ma	arch 11, 2005.	By /s/ Michelle L. Cannon MICHELLE L. CANNON
13			Attorneys for TWIN RIDGES ELEMENTARY SCHOOL DISTRICT
14			
15			KRONICK MOSKOVITZ TIEDEMANN & GIRARD
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17	Δ ΔΤΕ <u></u> <u></u> ΓΟ	arch 11, 2005.	By /s/ Susan R. Denious as authorized on 3/10/05
18	DATED. WR	alon 11, 2003.	SUSAN R. DENIOUS
19			Attorneys for SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
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	Defendants' No	TICE OF MOTIONS IN LIMINE	2 CIV. S-98-0266 FCD PAN