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9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 PLANS, Inc.,)	Case No. CIV. S-98-0266 FCD PAN
)	
14	Plaintiffs,) Date: April 1, 2005
)) Time: 10:00 a.m.
15 v.)) Place: Courtroom 2
)	
16 SACRAMENTO CITY UNIFIED SCHOOL)	SUPPLEMENTAL DECLARATION OF
DISTRICT, TWIN RIDGES ELEMENTARY)	MICHELLE L. CANNON IN SUPPORT OF
17 SCHOOL DISTRICT, DOES 1-100,)	MOTIONS IN LIMINE
)	
18	Defendants.)
)	

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20 I, Michelle L. Cannon, declare as follows:
21 1. I am an attorney at law duly authorized to practice in the United States District
22 Court, Eastern District of California, and I am one of the attorneys of record for Defendant
23 TWIN RIDGES ELEMENTARY SCHOOL DISTRICT (hereafter "TRESD").
24 2. Attached collectively as Exhibit A are true and correct copies of Plaintiff's Answers to
25 Interrogatories Set No. One, collectively propounded by TRESD and SACRAMENTO CITY
26 UNIFIED SCHOOL DISTRICT (hereafter "SCUSD").
27 3. Attached as Exhibit B is a true and correct copy of Plaintiff's Answer to Interrogatories, Set
28 No. Two.

1 4. Attached as Exhibit C is a true and correct copy of Plaintiff's Answer to Special
2 Interrogatories, Set. No. Three.

3 5. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's Supplemental Answer to
4 Special Interrogatories, Set. No. Three.

5 6. Attached hereto as Exhibit E is a true and correct copy of Plaintiff's Second Supplemental
6 Answer to Special Interrogatories, Set No. Three.

7 7. Attached collectively as Exhibit F are true and correct copies of Plaintiff's Responses to
8 Request for Production of Documents, Set No. One, propounded by TRESA and SCUSD.

9 8. Attached hereto as Exhibit G is a true and correct copy of Plaintiff's Response to Request for
10 Production of Documents, Set No. Two, received January 15, 2004.

11 9. Attached hereto as Exhibit H is a true and correct copy of Plaintiff's Response to Request for
12 Production of Documents, Set No. Two, received April 5, 2004.

13 10. Attached hereto as Exhibit I is a true and correct copy of Plaintiff's Response to Request For
14 Admissions, Set. No. One.

15 11. Attached hereto as Exhibit J is a true and correct copy of Plaintiff's Supplemental Response
16 to Request for Admissions, Set No. One, received on April 5, 2004.

17 12. The discovery responses of Plaintiff attached hereto are the only discovery responses
18 Defendants have received from Plaintiff in this case.

19 13. Plaintiff did not disclose the names set forth in Defendants' moving papers as witnesses or
20 potential witnesses in this case until it filed its most recent witness list with the court in
21 January 2005, almost one year after discovery closed.

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1 14. Plaintiff did not disclose documents as set forth in Defendants' moving papers until it filed
2 its most recent exhibit list with the court in January 2005, almost one year after discovery
3 closed.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is true
5 and correct and that this declaration was executed this 25th day of March, 2005, at Sacramento,
6 California.

7 /s/ Michelle L. Cannon
8 Michelle L. Cannon

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