1 2 3 4 5 6 7	GIRARD & VINSON, LLP CHRISTIAN M. KEINER, SBN 95144 MICHELLE L. CANNON, SBN 172680 1006 Fourth Street, Eighth Floor Sacramento, CA 95814-3326 Telephone: (916) 446-9292 Attorneys for TWIN RIDGES ELEMENTARY SCHOOL DISTRICT KRONICK MOSKOVITZ TIEDEMANN & GIRARD SUSAN R. DENIOUS, SBN 155033 400 Capitol Mall, 27th Floor		
8	Sacramento CA 95814-4416 Telephone: (916) 321-4500		
9	Attorneys for SACRAMENTO CITY UNIFIED SCHOOL DISTRICT		
10	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12			
13	PLANS, Inc.,	Case No. CIV. S-98-0266 FCD PAN	
14 15	Plaintiffs,)	Date: April 1, 2005 Time: 10:00 a.m.	
16	v.)	Place: Courtroom 2	
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			
26	 		
27 28	¹ Defendants file these motions in limine pursuant to the Court's direction at the February 11, 2005, pretrial conference. Defendants will file further motions in limine as appropriate prior to trial, to be heard the first day of trial.		

1	11. Motion in Limine to Exclude Testimony by Witnesses not Previously Disclosed;			
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3	3 13. Motion in Limine to Exclude Exper	•		
4	4 Defendants will respectfully move the Cou	Defendants will respectfully move 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	9 GIRA	RD & VINSON, LLP		
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12	DATED: March 11, 2005. By	/s/ Michelle L. Cannon MICHELLE L. CANNON		
13		eys for TWIN RIDGES ELEMENTARY SCHOOL RICT		
14	14			
15	15 KROI	NICK MOSKOVITZ TIEDEMANN & GIRARD		
16	16			
17	17 DATED: March 11, 2005. By	/s/ Susan R. Denious as authorized on 3/10/05		
18	18	SUSAN R. DENIOUS		
19	19 SCHO	neys for SACRAMENTO CITY UNIFIED		
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	DEFENDANTS' NOTICE OF MOTIONS IN LIMINE	2 Defendants' Notice of Motions in Limine CIV. S-98-0266 FCD PAN		