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SAN MATEO COUNTY

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FILED
By Superior Court of California, County of San Mateo
ON 05/09/2025
By /s/ Berini, Anthony
Deputy Clerk

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Attorneys for Respondent
SEQUOIA UNION HIGH SCHOOL DISTRICT

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

DEFENDING EDUCATION,

Plaintiff/Petitioner,

v.

SEQUOIA UNION HIGH SCHOOL DISTRICT,

Defendant/Respondent.

Case No. 24-CIV-03586

STIPULATION TO DISMISS CASE; NH ~~[PROPOSED]~~ ORDER

CMC Date: June 4, 2025
Time: 9:00 AM
Dept.: 28
Judge: Nicole S. Healy

Complaint Filed: June 13, 2024

Exempt from filing fees pursuant to Gov. Code, § 6103.

DANNIS WOLIVER KELLEY
200 CALIFORNIA STREET, SUITE 400
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On December 19, 2024, the parties filed a stipulation to pause briefing, vacate the merits hearing, and file a status report by February 7, 2025. The parties concluded that it would be beneficial to pause further briefing and vacate the hearing date to allow the parties to discuss narrowing or resolving the litigation. The Court then vacated the merits hearing and scheduled a case management conference for February 26, 2025. Thereafter, the parties filed a second stipulation to pause briefing, file a status report by March 12, 2025, and schedule a case management conference on April 2, 2025. The Court then ordered that the parties file a status report by March 12, 2025 and scheduled a case management conference for April 2, 2025. The parties filed a third stipulation to pause briefing, file a status report by March 26, 2025, and schedule a case management conference on April 16, 2025 or at a later date as determined by the Court. The Court scheduled the case management conference for June 4, 2025 but retained the March 26, 2025 date for the parties to file a status report, which the parties did file and indicated that they were continuing to engage in settlement discussions. The parties also agreed and stipulated to file another status report on or before May 28, 2025.

For several months, the parties have engaged in productive discussions to narrow or resolve this litigation. As a result of these discussions, the parties have agreed to dismiss this case, with both parties agreeing to forego seeking any further remedies, including attorney's fees or costs.

IT IS THUS STIPULATED AND AGREED by and between Plaintiff/Petitioner DEFENDING EDUCATION (formerly doing business as PARENTS DEFENDING EDUCATION) and Defendant/Respondent SEQUOIA UNION HIGH SCHOOL DISTRICT as follows:

1. This case is hereby dismissed;
2. Both parties forego seeking any further remedies, including attorney's fees or costs.

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DATED: May 5, 2025

DANNIS WOLIVER KELLEY

By: _____
WILLIAM B. TUNICK
Attorneys for Defendant/Respondent
SEQUOIA UNION HIGH SCHOOL DISTRICT

DATED: May 1, 2025

CONSOVOY MCCARTHY PLLC

By: _____
J. MICHAEL CONNOLLY
Attorneys for Plaintiff/Petitioner
DEFENDING EDUCATION

DATED: May 2, 2025

BENBROOK LAW GROUP, PC

By: _____
BRADLEY A. BENBROOK
Attorneys for Plaintiff/Petitioner
DEFENDING EDUCATION

DANNIS WOLIVER KELLEY
200 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CA 94111

[PROPOSED] ORDER GRANTING

PARTIES' STIPULATION TO DISMISS CASE

The Stipulation to Dismiss Case of Defendant Sequoia Union High School District and Petitioner Defending Education, formerly doing business as Parents Defending Education, ("Parties") was considered by the Honorable Nicole S. Healy on _____, 2025, at _____ am/pm., in Department 28 of the above-entitled Court.

The Court, having read the papers filed by the Parties herein and having considered all relevant factors pertinent to such stipulation, the Court orders and finds as follows:

1. Good cause appearing, the Parties' Stipulation to Dismiss Case is GRANTED;

2. Pursuant to the Parties' Stipulation to Dismiss Case, neither party shall seek further remedies, including attorney's fees or costs.

IT IS SO ORDERED.

Electronically
SIGNED
By /s/ Healy, Nicole
05/09/2025

Dated: _____

_____
HONORABLE NICOLE HEALY

DANNIS WOLIVER KELLEY
200 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CA 94111

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN FRANCISCO)

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is: 200 California Street, Suite 400, San Francisco, CA 94111.

On the date set forth below I served the foregoing document described as **STIPULATION TO DISMISS CASE; [PROPOSED] ORDER** on interested parties in this action as follows:

BENBROOK LAW GROUP, PC
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Attorneys for Plaintiff/Petitioner Defending Education

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Attorneys for Plaintiff/Petitioner Defending Education

Court Copy to be emailed to:
complexcivil@sanmateocourt.org

☒ (VIA ELECTRONIC SERVICE) [Code Civ. Proc. Sec. 1010.6; CRC 2.251] by electronic mailing a true and correct copy through DANNIS WOLIVER KELLEY's electronic mail system from ahewitt@DWKesq.com to the email address(es) set forth above, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251. The transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **May 5, 2025** at San Pablo, California.

A'ree Hewitt

DANNIS WOLIVER KELLEY
200 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CA 94111