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15 *Attorneys for Plaintiffs*

16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA

18 CHARLES ANTHONY GUERRA,  
19 CHRYSTAL, and KARLTON  
20 BONTRAGER,

21 Plaintiffs,

22 v.

23 WEST LOS ANGELES COLLEGE and  
24 LOS ANGELES COMMUNITY  
COLLEGE DISTRICT,

25 Defendants.

) Case No.: 2:16-cv-06796 MWF (KSx)  
)  
)  
) **PLAINTIFFS' NOTICE OF**  
) **MOTION AND MOTION FOR**  
) **PARTIAL SUMMARY**  
) **JUDGMENT**  
)  
) Hearing Date: May 22, 2017  
) Time: 10:00 a.m.  
) Courtroom: 5A  
) Judge: Hon. Michael W. Fitzgerald  
)  
) Date Action Filed: September 9, 2016  
) Trial Date: August 22, 2017

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**NOTICE OF MOTION AND MOTION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on May 22, 2017, at 10:00 am, or at such other date and time as may be ordered by the Court, in Courtroom 5A, located at 350 West First Street, Los Angeles, California 90012, Plaintiffs will and hereby do move this Court for an order for partial summary judgment pursuant to Federal Rule of Civil Procedure 56 as to the liability of Defendants West Los Angeles College and Los Angeles Community College District for violations of Title II of the Americans with Disabilities Act, 42 U.S.C. § 12131 *et seq.* (First Claim for Relief), Section 504 of the Rehabilitation Act 29 U.S.C. § 794 *et seq.* (Second Claim for Relief), California Government Code § 11135 (Third Claim for Relief), and the Unruh Civil Rights Act, Cal. Civ. Code § 51 *et seq.* (Fifth Claim for Relief), and California Civil Code § 54 *et seq.* (Sixth Claim for Relief).

As set forth herein, there is no genuine issue as to material facts relating to Defendants’ liability on the above-identified Claims.

The Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities and supporting declarations filed and submitted concurrently, all of the pleadings, papers, and records filed in this action, and any further evidence that the Court may consider at the hearing on this Motion.

This motion is made following the conference of Counsel pursuant to Local Rule 7-3 which took place on April 5, 2017.

DATED: April 17, 2017

Respectfully submitted,

/s/ Aaron J. Fischer

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