

THE PARTIES TO THE ABOVE-CAPTIONED MATTER, by and through their respective attorneys of record, hereby enter into this stipulation to extend the deadline and hearing date for motions to compel on certain discovery disputes detailed below based on the following:

WHEREAS, the deadline to file non-dispositive pre-trial motions is April 15, 2011 (Declaration of Kathy H. Gao (“Gao Decl.”), ¶ 2); and

WHEREAS, at issue now are written discovery requests defendants Corrections Corporation of America (“Corrections Corp.”) and CCA of Tennessee, LLC (“CCA”) (hereinafter collectively referred to as “Defendants”) served on plaintiff Terry Sandres (“Plaintiff”) which include the following:

- (a) CCA’s Third Set of Requests for Production of Documents (Nos. 50-51);
- (b) CCA’s Second Set of Requests for Admissions (Nos. 6-7);
- (c) CCA’s Second Set of Special Interrogatories (Nos. 17-19);
- (d) CCA’s Third Set of Special Interrogatories (No. 20);
- (e) Corrections Corp.’s Second Set of Special Interrogatories (Nos. 17-24);

(hereinafter collectively referred to as the “Discovery Requests”) (Gao Decl., ¶ 3); and

WHEREAS, Plaintiff has served responses to the Discovery Requests (Gao Decl., ¶ 4); and

WHEREAS, on March 25, 2011, Defendants’ counsel sent Plaintiff’s counsel a meet and confer letter regarding Plaintiff’s responses to the Discovery Requests and called for Plaintiff to provide supplemental responses thereto no later than April 1, 2011 (Gao Decl., ¶ 5); and

WHEREAS, on March 31, 2011, Plaintiff’s counsel responded to Defendants’ counsel’s March 25, 2011 meet and confer letter and indicated that Plaintiff would not be able to provide supplemental discovery responses until the week of April 11, 2011, at the earliest, due to a prepaid vacation from April 2-9, 2011 (Gao Decl., ¶ 6); and

WHEREAS, the parties have scheduled private mediation for April 14, 2011 (Gao Decl., ¶ 7); and

WHEREAS, the parties have continued to diligently meet and confer on these outstanding discovery disputes (Gao Decl., ¶ 8); and

WHEREAS, to allow the parties additional time to meet and confer on the pending

discovery issues and participate in private mediation, as well as to avoid burdening the court with unnecessary discovery motions, the parties believe that it is in their best interest, as well as in the preservation of their financial resources, that the deadline to file any necessary motions to compel concerning the Discovery Requests – limited to the issues specifically identified in Defendants’ March 25, 2011 meet and confer correspondence – be continued to April 29, 2011, and the date to have such motions heard by the Court be continued to June 10, 2011 (Gao Decl., ¶ 9).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED and requested by the parties through their respective attorneys of record that this Court order as follows:

1. That the deadline to file any necessary motions to compel concerning the Discovery Requests – limited to the issues specifically identified in Defendants’ March 25, 2011 meet and confer correspondence – is continued to April 29, 2011; and
2. That the date to have any necessary motions to compel concerning the Discovery Requests – limited to the issues specifically identified in Defendants’ March 25, 2011 meet and confer correspondence – heard by the Court is continued to June 10, 2011.

IT IS SO STIPULATED.

APPELL HILAIRE BERNARDO LLP
/s/ **Barry M. Appell**
(As authorized on 4/13/11)

By: _____
Barry M. Appell
Attorneys for Plaintiff Terry Sandres

Dated: April 13, 2011

GLEASON & FAVOROTE LLP
/s/ **Kathy H. Gao**

By: _____
Kathy H. Gao
Attorneys for Defendants Corrections Corporation
of America and CCA of Tennessee, LLC

IT IS SO ORDERED.

Dated: April 13, 2011

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE

