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6 Attorneys for the United States

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 TERASA HUNTER, et al.,

11 Plaintiffs,

12 v.

13 VETERANS ADMINISTRATION, et al.,

14 Defendants.  
15

CASE NO. 1:15-cv-01460 EPG

**EX PARTE REQUEST AND ORDER  
TO EXTEND DISCOVERY  
DEADLINE FOR LIMITED  
PURPOSE OF COMPLETING  
PLAINTIFF'S DEPOSITION**

16  
17 The United States requests a brief extension of time by which nonexpert discovery is to  
18 be completed from August 15, 2016 to and including August 16, 2016, for the limited purpose of  
19 completing the deposition of Plaintiff Terasa Hunter, based on the following:

20 1. The United States noticed Plaintiff's deposition for August 8, 2016 which was within  
21 the original date of nonexpert discovery cutoff. Due to Plaintiff's counsel's trial, the parties  
22 agreed to move the date of the deposition.

23 2. The United States agreed to the date proposed by Plaintiff's counsel,  
24 August 16, 2016, the same day it was offered to allow the case to expeditiously move toward the  
25 United States' intended dispositive motion.

26 3. The United States forwarded Plaintiff's counsel a proposed stipulation to extend  
27 discovery for the purpose of taking Plaintiff's deposition. However, as of the time of this filing,  
28 Plaintiff's counsel has not responded to the stipulation.

1 4. The United States also requests that the Court order all other nonexpert discovery in  
2 this action to close on August 15, 2016, keeping the original dates as directed by the Court's  
3 Order of January 8, 2016 (ECF No. 23).

4 For the reasons set forth above, the United States respectfully requests that the Court  
5 extend the deadline for nonexpert discovery to August 16, 2016, so that the United States may  
6 complete the deposition of Plaintiff.

7 Respectfully submitted,

8 Dated: August 12, 2016

PHILLIP A. TALBERT  
Acting United States Attorney

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10 By: /s/ Alyson A. Berg  
11 ALYSON A. BERG  
Assistant U.S. Attorney

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13  
14 **ORDER**

15 Having reviewed the request submitted by the United States, as well as the  
16 representations contained in the pleading, the date on which depositions may be taken is hereby  
17 extended to August 16, 2016 to allow the deposition of Plaintiff Terasa Hunter.

18  
19 IT IS SO ORDERED.

20  
21 Dated: August 15, 2016

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE