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Attorneys for Defendant
AMERICAN GENERAL FINANCE, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SANDRA BATISTE,

Plaintiff,

v.

NATIONAL INFORMATION SERVICES,
AMERICAN GENERAL FINANCE and
MIKE DOE,

Defendants.

Case No. 2:08-CV-00378-GEB-EFB

**STIPULATION AND ORDER RE
EXTENSION OF TIME TO RESPOND TO
DISCOVERY AND WITHDRAWAL OF
DEPOSITION NOTICE**

1 Plaintiff Sandra Batiste ("Plaintiff") and Defendant American General Finance, Inc.
2 ("AGF"), by and through their counsel of record, hereby stipulate to the following:

3 1. **WHEREAS**, Plaintiff served a set of discovery requests entitled Plaintiff Sandra
4 Batiste's Interrogatories, Requests for Admission, Requests for Production of Documents and
5 Requests for Production of Statements to Defendant American General Finance (the "Requests");

6 2. **WHEREAS**, the current due date for AGF to serve responses to the Requests is
7 January 21, 2009;

8 3. **WHEREAS**, Plaintiff has agreed to a two-week extension of time for AGF to
9 respond to the Requests, making AGF's responses now due on or before February 4, 2009;

10 4. **WHEREAS**, on December 29, 2009, Plaintiff served a Notice of Taking Deposition
11 of American General Finance's Designated Representative Pursuant to Fed. R. Civ. P. 30(B)(6),
12 noticing the date of the deposition as January 28, 2009, at 9:00 a.m. in San Diego, California.

13 5. **WHEREAS**, Plaintiff will withdraw the above-mentioned deposition notice, and
14 will re-notice the deposition to take place in San Francisco, California, on a mutually agreeable date
15 and time.

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS**
17 **FOLLOWS:**

18 1. AGF's responses to the Requests are due on or before February 4, 2009;

19 2. Plaintiff's current deposition notice will be withdrawn;

20 3. Plaintiff will re-notice the deposition to take place in San Francisco, California, at a
21 mutually agreeable date and time.

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1 **IT IS SO STIPULATED.**

2 Dated: January 14, 2009

HOLLAND & KNIGHT LLP

3
4 /s/

5
6 Andrew T. Caulfield

7 Attorneys for Defendant
8 AMERICAN GENERAL FINANCE

9 Dated: January 13, 2009

HYDE & SWIGART

10
11 /s/

12 Joshua B. Swigart

13 Attorneys for Plaintiff
14 SANDRA BATISTE

15 **IT IS SO ORDERED.**

16 DATED: January 14, 2009.

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19 EDMUND F. BRENNAN
20 UNITED STATES MAGISTRATE JUDGE
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