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6 Attorneys for Defendants

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 8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT**

10 ASSOCIATED GENERAL CONTRACTORS)	Case No.: 2:09-CV-01622-JAM-GGH
11 OF AMERICA, SAN DIEGO CHAPTER,)	
12 INC., a nonprofit California corporation,)	STIPULATION AND ORDER
13 Plaintiff,)	REGARDING DEFENDANTS'
14 vs.)	RESPONSES TO DISCOVERY
15 CALIFORNIA DEPARTMENT OF)	PROPOUNDED BY PLAINTFF
16 TRANSPORTATION, et al.,)	
17 Defendants.)	

18
19 WHEREAS, Plaintiff has propounded one set of requests for admission to State of
20 California, responses to which are currently due on November 16, 2009 by agreement of the
21 parties; and

22 WHEREAS, Plaintiff has propounded one set of requests for admission, one set of
23 requests for production of documents and one set of interrogatories to Defendant Will Kempton,
24 responses to which are currently due on December 23, 2009 by agreement of the parties; and

25 WHEREAS, Plaintiff has propounded one set of requests for admission, one set of
26 requests for production of documents and one set of interrogatories to Defendant Olivia
27 Fonseca, responses to which are currently due on December 23, 2009 by agreement of the
28 parties; and

1 WHEREAS, Plaintiff has propounded one set of requests for production of documents
2 and one set of interrogatories to Defendant State of California, responses to which are currently
3 due on December 16, 2009 by agreement of the parties; and

4 WHEREAS, Defendants last week retained outside counsel (Rosales Law Partners and
5 Moscone, Emblidge & Quadra) to assist in the defense of this litigation; and

6 WHEREAS, Outside counsel for Defendants needs time to adequately prepare responses
7 to the discovery requests described above; and

8 WHEREAS, Plaintiff is willing to provide Defendants additional time and to have one
9 uniform date on which responses to all the outstanding discovery requests are due;

10 The parties hereby stipulate and agree that responses to all the discovery requests
11 described above shall now be due on or before December 23, 2009.

12 IT IS SO STIPULATED.

13
14 DATE:

SHARON L. BROWNE
RALPH W. KASARDA
ANTONIO J. SENEGORE

15
16
17 By _____

18 Attorney for Plaintiff

19
20 DATE:

RONALD BEALS, Chief Counsel
THOMAS C. FELLEENZ, Deputy Chief Counsel
DANIEL A. NEAR, Assistant Chief Counsel

21
22
23 By _____

KATHRYN T. PAPALIA
Attorney for Defendants

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25
26 IT IS SO ORDERED.

27 DATED; 11/16/2009

28 _____
/s/ John A. Mendez

UNITED STATES DISTRICT JUDGE