

1 SHAW VALENZA LLP
 D. Gregory Valenza, Bar No. 161250
 2 gvalenza@shawvalenza.com
 Amy K. Lee, Bar No. 244542
 3 alee@shawvalenza.com
 300 Montgomery Street, Suite 788
 4 San Francisco, California 94104
 Telephone: (415) 983-5960
 5 Facsimile: (415) 983-596

6 Attorneys for Defendant
 The Jackson Laboratory

7 Leo F. Donahue, Esq.
 Leo F. Donahue, Inc.
 8 Donahue@lfdlaw.net
 11344 Coloma Road, Suite 160
 9 Gold River, CA 95670
 Tele: (916) 859-5999
 10 Fax: (916) 859-5984

11 Attorneys for Plaintiff Kelly Keehner

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION
 14

15 KRISTINA Y. DAVIS,
 16 Plaintiff,

17 v.

18 THE JACKSON LABORATORY, a
 19 Corporation of unknown origin; and DOES
 20 1 through 100, inclusive,
 21 Defendants.

Case No. 2:11-cv-01944-MCE-DAD

**STIPULATION AND ORDER TO PERMIT
 LIMITED DISCOVERY BEYOND
 DISCOVERY DEADLINE
 [E.D. Cal. L. R. 137; 143]**

Judge: Hon. Dale A. Drozd
 U.S. Magistrate Judge

22 Plaintiff KRISTINA Y. DAVIS ("Plaintiff") and Defendant THE JACKSON
 23 LABORATORY ("Defendant"), by and between their respective attorneys of record, hereby
 24 stipulate as follows:

25 1. On August 3 and 4, 2012, Defendant took the deposition of Plaintiff. During the
 26 deposition, a dispute occurred between the parties as to a line of questioning involving alcohol
 27 and Plaintiff was instructed not to answer.

1 2. On August 7, 2012, Defendant's attorney Amy K. Lee, Esq. sent Plaintiff's
2 attorney Leo F. Donahue, Esq. meet and confer correspondence regarding the alcohol-related line
3 of questioning.

4 3. On August 14, 2012, Mr. Donahue wrote a response to Ms. Lee's meet and confer
5 correspondence. On that same date, Mr. Donahue and Ms. Lee met and conferred over the
6 telephone. During the meet and confer telephone conversation, the parties agreed that they will
7 engage in and conclude good faith settlement discussions by August 24, 2012 and will stay the
8 issue as to alcohol-related questioning at Plaintiff's deposition until then.

9 4. The discovery cut-off in this case is September 21, 2012.

10 5. The parties agree that discovery motions and Plaintiff's deposition related to any
11 alcohol-related line of questioning will not be subject to the September 21, 2012 discovery cut-
12 off. As to the alcohol-related issue only, the discovery deadline will remain open until the court
13 rules on whether the alcohol-related questions are permitted at Plaintiff's deposition, and
14 Plaintiff's deposition has concluded as to that issue only (if the court permits any questioning).
15 All other discovery must be completed by the September 21, 2012 discovery cut-off.

16 SO STIPULATED:

17 Dated: August 16, 2012

SHAW VALENZA LLP

19 By: /s/Amy K. Lee
20 D. Gregory Valenza
21 Amy K. Lee
22 Attorneys for Defendant
23 THE JACKSON LABORATORY

24 Dated: August 16, 2012

LEO F. DONAHUE, INC.

25 By: /s/Leo F. Donahue
26 Leo F. Donahue
27 Kevin W. Harris
28 Attorneys for Plaintiff
Kelly Keehner

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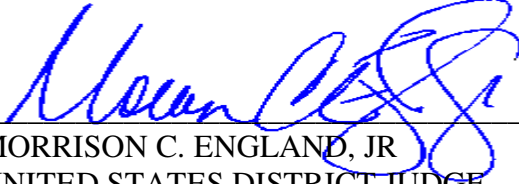
ORDER

Pursuant to the parties' Stipulation, and GOOD CAUSE APPEARING therefore:

IT IS HEREBY ORDERED that discovery motions and Plaintiff's deposition related to any alcohol-related line of questioning will not be subject to the September 21, 2012 discovery cut-off. As to the alcohol-related issue only, the discovery deadline will remain open until the court rules on whether the alcohol-related questions are permitted at Plaintiff's deposition, and Plaintiff's deposition has concluded as to that issue only (if the court permits any questioning). All other discovery must be completed by the September 21, 2012 discovery cut-off.

IT IS SO ORDERED.

Dated: August 23, 2012


MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE