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16 UNITED STATES DISTRICT COURT - EASTERN DISTRICT OF CALIFORNIA
 17 SACRAMENTO DIVISION

19 KELLY KEEHNER,

20 Plaintiff,

21 v.

23 THE JACKSON LABORATORY, a
 Corporation of unknown origin; and DOES
 24 1 through 100, inclusive,

25 Defendants.

Case No. 2:11-cv-01954-WBS-EFB

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

Courtroom 24
 Judge: Hon. Edmund F. Brennan
 U.S. Magistrate Judge

26 Plaintiff KELLY KEEHNER ("Plaintiff") and Defendant THE JACKSON
 27 LABORATORY ("Defendant"), by and between their respective attorneys of record, hereby
 28 stipulate as follows:

1 1. On February 23, 2012, Defendant filed and served a Notice of Motion and Motion
2 to Compel Answers to Deposition Questions and Production of Documents to obtain Plaintiff's
3 Employment Development Department records. The Motion to Compel hearing is scheduled to
4 take place on March 21, 2012.

5 2. On March 3, 2012, Plaintiff agreed to sign the authorization for release of her
6 Employment Development Department records.

7 3. On March 5, 2012, Defendant's attorney, Amy K. Lee, Esq., learned from the
8 Employment Development Department representative that after receipt of Plaintiff's signed
9 authorization it could take the Employment Development Department months to produce the
10 requested records.

11 4. The discovery cut-off in this case is March 29, 2012.

12 5. Pursuant to Local Rule 251, on March 6, 2012, Plaintiff's attorney Leo F.
13 Donahue, Esq. and Defendant's attorney Amy K. Lee, Esq. engaged in the required meet and
14 confer conference to resolve the discovery issues set forth in the Motion to Compel. During the
15 meet and confer conference, Plaintiff's attorney Leo F. Donahue reiterated that Plaintiff will sign
16 the Employment Development Department authorization for release of records.

17 6. The parties agree that any records received from the Employment Development
18 Department will not be subject to the March 29, 2012 discovery cut-off. The discovery deadline
19 will remain open until the documents are received by Defendant as to the Employment
20 Development Department records only. All other discovery must be completed by the March 29,
21 2012 discovery cut-off.

22 SO STIPULATED:

23 Dated: March 8, 2012

SHAW VALENZA LLP

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25 By: /s/Amy K. Lee

26 D. Gregory Valenza
27 Amy K. Lee
28 Attorneys for Defendant
THE JACKSON LABORATORY

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Dated: March 8, 2012

LEO F. DONAHUE, INC.
LAW OFFICES OF KEVIN W. HARRIS

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

ORDER

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

IT IS HEREBY ORDERED that any records received from the Employment Development Department will not be subject to the March 29, 2012 discovery cut-off. The discovery deadline will remain open until the documents are received by Defendant as to the Employment Development Department records only. All other discovery must be completed by the March 29, 2012 discovery cut-off.

DATED: March 12, 2012.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE