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17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF CALIFORNIA  
19

20 JAVIER SOLIS,

21 Plaintiff,

22 v.

23 TARGET CORPORATION, a corporation; and  
DOES 1-100 inclusive,

24 Defendants.  
25  
26

No. 2:14-cv-00686-KJM-DB

**STIPULATION AND ORDER  
SHORTENING TIME TO HEAR  
DEFENDANT TARGET  
CORPORATION'S NOTICE OF MOTION  
AND MOTION FOR PROTECTIVE  
ORDER TO PRECLUDE DEPOSITION  
OF JESSICA KLOCKE-WILLIAMS,  
FORMER SENIOR PARALEGAL FOR  
TARGET**

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**STIPULATION**

The parties Plaintiff Javier Solis and Defendant Target Corporation, by and through their respective counsel hereby stipulate, pursuant to Local Rule 6-144(e), as follows:

1. On September 23, 2016, Defendant filed its Notice of Motion and Motion for Protective Order to preclude the deposition of Jessica Klocke-Williams, formerly Target’s Senior Paralegal. Pursuant to Local Rule 251(a), Defendant selected October 14, 2016 as the hearing date.

2. On September 28, 2016, the Court issued an order advising it is unavailable to hear Defendant’s motion on October 14, 2016.

3. Good cause exists to hear the matter on shortened notice because the deposition of Ms. Klocke-Williams is noticed for October 16, 2016 in Minneapolis, Minnesota. It is Defendant’s position that the deposition is improper because it seeks information and documents protected from disclosure by the attorney-client privilege and/or the work product doctrine. However, Plaintiff believes that Ms. Klocke-Williams was not a paralegal, and that she possesses discoverable percipient witness information and information regarding Target’s reasonable accommodation policy and its implementation that no one at the Distribution Center level possesses. Before the parties prepare for and make travel arrangements for the deposition, Defendant seeks an order from the court determining the propriety of this deposition.

4. Should the deposition go forward, Defendant will also request guidance from the court as to the relevant scope of questioning and a mechanism, such as an opportunity to dial the Court for guidance during the deposition if the need arises, so as to prevent the disclosure of privileged information or to prevent the need to reconvene the deposition at a later date. Such a mechanism will save costs and will assist in discovery matters being resolved prior to the approaching discovery cut-off date of November 15, 2016.

5. The parties stipulate to an order shortening time for this court to hear Defendant’s motion on October 7, 2016, at 10:00 a.m.

6. The parties further stipulate that their joint statement regarding discovery dispute and supporting documents will be filed by October 4, 2016.

1           7.       Should the court be unable to hear the matter on October 7, 2016, the parties agree that  
2 Ms. Klocke-Williams' deposition will be continued to a mutually-agreeable date in October, 2016 after  
3 the court has issued a ruling on Defendant's motion sufficiently prior to the Discovery Cut-off date so if  
4 a further dispute arises it may be resolved.

5  
6 DATED: September 29, 2016

SEYFARTH SHAW LLP

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8 By: /s/Enedina S. Cardenas  
9       Laura J. Maechtlen  
      Enedina S. Cardenas

10 Attorneys for Defendant  
11 TARGET CORPORATION

12 DATED: September 29, 2016

LAW OFFICES OF JILL TELFER


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14 By: /s/Jill Telfer (with permission)  
15       Jill Telfer

16 Attorney for Plaintiff  
17 JAVIER SOLIS  
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**ORDER**

IT IS ORDERED THAT Defendant Target Corporation's Motion for Protective Order entitled "Motion for Protective Order to Preclude the Deposition of Jessica Klocke-Williams, Formerly Target's Senior Paralegal," (Dkt. No. 88), shall be heard on **October 7, 2016**, in Courtroom 27 at **10:00 a.m.** The parties' joint statement regarding discovery dispute and supporting documents will be filed by **October 3, 2016.**

Dated: September 29, 2016



DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE

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