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7 Attorneys for Defendant

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 E.K. WADE,)	Consolidated Case No. C 08-00001 JSW /
)	EDL
12 Plaintiff,)	
)	JOINT STIPULATION AND
13 v.)	[PROPOSED] ORDER TO EXTEND
)	THE NON-EXPERT DISCOVERY CUT-
14 ELAINE CHAO, SECRETARY OF)	OFF
15 LABOR, ET AL.)	
)	
16 Defendant.)	
)	
17)	

18 WHEREAS, on October 3, 2008, the Honorable Magistrate Judge Elizabeth Laporte issued a
19 Case Management and Pretrial Order for Jury Trial (“Case Management Order”);

20 WHEREAS, the Case Management Order sets the non-expert discovery cut-off for December
21 12, 2008;

22 WHEREAS, plaintiff E.K. Wade (Pro se) and the defendant Elaine Chao, Secretary of Labor,
23 by and through her counsel (collectively the “parties”) have determined that they will not be able
24 to complete non-expert discovery prior to December 12, 2008, and therefore have agreed to
25 extend the non-expert discovery cut-off to February 9, 2009 and to request an order providing the
26 same;

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1 ACCORDINGLY, it is hereby agreed by the parties, E.K. Wade and defendant Elaine Chao,
2 Secretary of Labor, by and through her counsel, that the non-expert discovery cut-off be moved
3 to February 9, 2009.

4 So Stipulated.

5
6 DATED: November 21, 2008

Respectfully submitted,

7
8 JOSEPH P. RUSSONIELLO
9 United States Attorney

/s

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11 _____
12 MELISSA K. BROWN
13 Assistant United States Attorney

14 Dated: November 21, 2008

/s

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16 _____
17 E.K. WADE
18 Pro Se Plaintiff

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PROPOSED | ORDER

Pursuant to the stipulation of the parties, the non-expert discovery cut-off is moved from December 12, 2008 to February 9, 2009.

IT IS SO ORDERED

Dated: November 25, 2008

