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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 ALBERTO ROCHA, Ph.D.)
 14 Plaintiff,)
 15 v.)
 16 HILDA L. SOLIS, Secretary, Department of)
 Labor,)
 17 Defendant.)
 18)
 19)

No. 08-3049 MHP

STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE FACT
 DISCOVERY CUT-OFF FOR LIMITED
 PURPOSE

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1 The plaintiff, Alberto Rocha (“Plaintiff) and the defendant Hilda Solis, Secretary of
2 Department of Labor (“Defendant”) by and through their counsel (collectively the “parties”)
3 assert as follows:

4 WHEREAS, on August 6, 2009, the Honorable Marilyn H. Patel issued an Order
5 pursuant to the parties’ Stipulation To Continue Hearing and Discovery Deadlines (“Order”);

6 WHEREAS, pursuant to the Order the deposition deadline was set for October 30, 2009;

7 WHEREAS, the parties are unable to complete the depositions of Ron Hiraga and Alberto
8 Rocha prior to the October 30, 2009 deadline;

9 ACCORDINGLY, it is hereby agreed by the parties, by and through their counsel, that the
10 deposition deadline be continued to December 8, 2009 for the sole purposes of taking the
11 deposition of Ron Hiraga and Alberto Rocha.

12 So Stipulated.

13 DATED: October 29, 2009

Respectfully submitted,

14 JOSEPH P. RUSSONIELLO
15 United States Attorney

/s/ Melissa Brown

16 _____
17 MELISSA K. BROWN
Assistant United States Attorney

18 DATED: October 29, 2009

/s/ Howard Moore JR.

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20 HOWARD MOORE, JR.
21 Attorney for the Plaintiff Alberto Rocha

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~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, the deposition deadline is continued until December 8, 2009.

IT IS SO ORDERED

Dated: _ 11/4/09 _____

