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

13 UNITED STATES OF AMERICA,)	No. C 08-5005 MMC (EDL)
)	
14 Plaintiff,)	
)	
15 v.)	STIPULATION FOR LEAVE
)	TO FILE DECLARATION IN
16 ZURICH INSURANCE COMPANY,)	SUPPORT OF PLAINTIFF'S
17 ZURICH AMERICAN INSURANCE)	MOTION TO QUASH SUBPOENA/
18 COMPANY and STEADFAST)	OR FOR PROTECTIVE ORDER
INSURANCE COMPANY,)	
)	Date: August 31, 2010
19 Defendants.)	Time: 2:00 pm
)	Courtroom E, 15th Floor

21 On August 3, 2010, the above-named plaintiff ("Plaintiff") filed two motions declarations
 22 related to discovery disputes in the above-captioned case, plus a motion for order shortening time
 23 for hearing of those two motions, and related declarations in support of all three motions. In
 24 connection with one of the motions, the United States' Motion to Quash the Defendants'
 25 Subpoena to Testify at a Deposition or to Produce Documents in a Civil Action served on Joshua
 26 A. Bloom ("Motion to Quash"), the Plaintiff had prepared and intended to file three supporting
 27 declarations. One of those three declarations was the Declaration of Charles O'Connor in
 28

1 Support of the United States' Motion to Quash Subpoena of Joshua A. Bloom ("O'Connor
2 Declaration"), a copy of which is attached hereto.

3 On August 13, 2010, counsel for the Plaintiff discovered that the O'Connor Declaration was
4 not among the documents on file with the Court. Further investigation disclosed that the Plaintiff
5 had inadvertently failed to complete the ECF filing of the O'Connor Declaration. Upon learning
6 of that failure, counsel for Plaintiff sent an electronic message, with an attached copy of the
7 O'Connor Declaration, to counsel for Defendants Zurich American Insurance Company and
8 Steadfast Insurance Company ("Defendants"). The message described the inadvertent failure of
9 Plaintiff to complete the ECF filing of that document on August 3, 2010, and requested a
10 stipulation for leave to file the O'Connor Declaration, now. Counsel for Defendants has
11 graciously agreed to so stipulate.

12 Therefore, IT IS HEREBY STIPULATED by the parties, through the respective undersigned
13 counsel, that the Plaintiff may, upon leave granted by this Court, file the O'Connor Declaration
14 with the Court at this time.

15 Respectfully submitted,

16 MELINDA L. HAAG
17 United States Attorney

18 /s/

19 Dated: August 13, 2010

20 By: _____
21 CHARLES M. O'CONNOR
22 Assistant United States Attorney

23 Attorneys for the United States of America

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SQUIRE, SANDERS & DEMPSEY L.L.P.

Dated: August 13, 2010

/s/

By: _____
ETHAN H. SEIBERT

Attorneys for the Defendants and Counter-
Claimant ZURICH AMERICAN
INSURANCE COMPANY and
STEADFAST INSURANCE COMPANY

ORDER

Pursuant to the foregoing stipulation, it is so ordered.

DATED: August 16, 2010


ELIZABETH D. LAPORTE
United States Magistrate Judge