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Attorney for Federal Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LAN T. LIU,  
Plaintiff,  
v.  
MICHAEL J. ASTRUE, SECRETARY  
SOCIAL SECURITY ADMINISTRATION,  
Defendant.

Case No. C-11-6120 (JSC)

**STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING DISCOVERY AND  
MOTION TO COMPEL DISCOVERY**

1 WHEREAS, the close of discovery in the above titled matter was October 15, 2012, and  
2 motions to compel discovery are currently due by October 25, 2012;

3 WHEREAS the legal counsel for the parties have met in person for meet and confer  
4 regarding outstanding discovery issues in an effort to resolve and/or limit the remaining  
5 discovery disputes between the parties, LAN T. LIU, Plaintiff and MICHAEL J. ASTRUE,  
6 COMMISSIONER OF SOCIAL SECURITY, Defendant (hereinafter "Parties"), request the  
7 following relief by the Court.

8 (1) Defendant agrees to amend the following responses to Plaintiff's Request for  
9 Production of Documents, Set One: 6, and 9;

10 (2) Defendant agrees to amend/reevaluate the following responses to Plaintiff's  
11 Request for Production of Documents, Set One: 7, and 12;

12 (3) Defendant agrees to reevaluate the following responses to Plaintiff's Request for  
13 Production of Documents, Set Two to determine if a supplement will be provided: 1;

14 (4) Defendant agrees to amend the following responses to Plaintiff's Interrogatory  
15 Requests, Set One: 1, (requests nos. 3, 4, 5, 6 incorporate by reference request No. 1), 7, 8, and  
16 13;

17 (5) Defendant agrees to amend the following responses to Plaintiff's Request for  
18 Admissions, Set One: 6, and 10;

19 (6) Defendant agrees to reevaluate the following responses to Plaintiff's Request for  
20 Admissions, Set One to determine if a supplement will be provided: 12 and 20;

21 (7) Defendant agrees to provide a privilege log;

22 (8) Defendant agrees to provide verifications for each of its interrogatory responses;

23 (9) Plaintiff agrees to supplement Defendant's Request for Interrogatories Nos. 9 and  
24 10;

1 (10) Plaintiff agrees to reevaluate the following responses to Defendant’s Interrogatory  
2 Requests, Set One to determine if a supplement will be provided: 2, 3, 4, and 8;

3 (11) Agreement could not be reached regarding Plaintiff’s Interrogatory Requests Nos.  
4 10-25 and Plaintiff’s Request for Production of Documents, Set One Request Nos. 4, 8, and 10,  
5 and the parties anticipate they will be the subject of a motion to compel/ request for additional  
6 discovery as it relates to these requests;

7 (12) Both parties will provide supplemental responses by November 7, 2012;

8 (13) The parties will meet and confer regarding these supplemental responses by  
9 November 14, 2012; and  
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11 ~~(14) Any motion to compel regarding the above requests is due to the Court by~~  
12 ~~November 28, 2012.~~

Any discovery dispute shall be brought in accordance with this Court's Standing Order on or before November 28, 2012.

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14  
15 Dated: October 24, 2012

/s/ electronic signature authorized  
MARY DRYOVAGE  
Law Offices of Mary Dryovage

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17 Dated: October 24, 2012

/s/ electronic signature authorized  
WENDY MUSELL  
Stewart & Musell, LLP

Attorneys for Plaintiff

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21 Dated: October 24, 2012

MELINDA L. HAAG  
United States Attorney

/s/ electronic signature

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JUAN D. WALKER  
Assistant United States Attorney  
Attorneys for Federal Defendant

1 IT IS SO ORDERED.

2  
3 Dated: October 25, 2012

  
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4 JACQUELINE SCOTT CORLEY  
5 UNITED STATES MAGISTRATE JUDGE  
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