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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 COURT'S ORDER
RE JOINT DISCOVERY LETTER BRIEF
(Dkt. No. 25)**

1 WHEREAS, the Court granted in part and denied in part the discovery relief requested by
2 Plaintiff in the Joint Discovery Letter Brief (Docket No. 25), and ordered Defendant to produce
3 documents regarding Plaintiff's Request for Production of Documents Nos. 4 and 8;

4 WHEREAS, the Court ordered the parties to meet and confer regarding Defendant's
5 supplemental responses to Plaintiff's Interrogatory Requests Nos. 7 and 8;

6 WHEREAS, the legal counsel for the parties have met and conferred regarding the above
7 discovery requests via telephone on December 5, 2012 in an effort to resolve and/or limit the
8 remaining discovery disputes between the parties and have resolved all outstanding discovery
9 issues set forth in the Court's Order Re: Joint Discovery Letter Brief, dated December 3, 2012
10 (Docket No. 27), LAN T. LIU, Plaintiff and MICHAEL J. ASTRUE, COMMISSIONER OF
11 SOCIAL SECURITY, Defendant (hereinafter "Parties"), request the following relief by the
12 Court.

13 (1) Defendant agrees to produce to Plaintiff documents responsive to Plaintiff's
14 Request for Production of Documents Nos. 4 and 8, if any, on or before January 8, 2013;

15 (2) Defendant agrees to amend Plaintiff's Interrogatory Requests Nos. 7 and 8 by
16 identifying with specificity including the page and line numbers of the deposition testimony of
17 Mr. Ortega and the bates number of any document that it is relying upon to assert that Plaintiff
18 had difficulties in other aspects of her job with respect to controlling client interviews;

19 (3) Defendant agrees to provide verifications for its supplemental interrogatory
20 responses. The supplemental interrogatory responses will be produced by December 19, 2012.
21 The verification will be produced by January 8, 2013; and

22 (4) The parties are not required to appear either for meet and confer or hearing on
23 December 6, 2012.
24

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1 Dated: December 5, 2012

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

2
3 Dated: December 5, 2012

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

Attorneys for Plaintiff

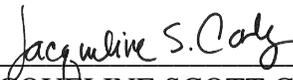
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7 Dated: December 5, 2012

MELINDA L. HAAG
United States Attorney

/s/ electronic signature authorized
JUAN D. WALKER
Assistant United States Attorney
Attorneys for Federal Defendant

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13 IT IS SO ORDERED.

14
15 Dated: December 6, 2012



JACQUELINE SCOTT CORLEY
UNITED STATES MAGISTRATE JUDGE