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12 Attorneys for Defendant  
13 UNITED AIR LINES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Pursuant to this Court's August 12, 2013 Order Granting Defendant's Administrative Motion to Continue Mediation Deadline, Plaintiff Christine Danscuk ("Plaintiff") and Defendant United Air Lines, Inc. ("Defendant") (together the "Parties") jointly submit this

1 Proposed Discovery Order to the Court to supplement the previous Case Management Order in  
2 this case as to depositions only.

3 **THE PARTIES STIPULATE AND AGREE TO THE FOLLOWING:**

4 The June 5, 2013 Case Management and Pretrial Order permits each Party to take 10  
5 depositions in this matter prior to the discovery cut-off before trial and orders the parties to  
6 meet and confer regarding a limited number of depositions prior to mediation. Pursuant to the  
7 Court's August 12, 2013 Order Granting Defendant's Administrative Motion to Continue  
8 Mediation Deadline and based on counsels' meet and confer discussion on August 15, 2013, the  
9 Parties agree to limit the number of depositions to be taken by either party prior to mediation to  
10 three each.

11 Specifically, the parties have agreed to produce Plaintiff and three of Defendant's  
12 witnesses for deposition during the last week of September 2013 or first week of October 2013.  
13 The parties agree to the following deposition schedule:

14 Plaintiff: September 24, 2013

15 Jimmy Chiang: September 27, 2013

16 Peter Haralabopoulos: October 1, 2013

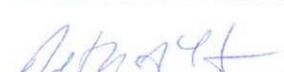
17 Robert Smith: October 3, 2013.

18 All other discovery, including special interrogatories, document requests and requests  
19 for admissions remain as set forth in the June 5, 2013 Case Management and Pretrial Order.

20 DATED: August 22, 2013

HUBER LAW FIRM

21 By:

  
22 BETH A. HUBER  
23 Attorney for Plaintiff  
24 CHRISTINE DANSCUK

25 DATED: August 20, 2013

REED SMITH LLP

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By:

/s/ Tiffany Renee Thomas  
27 DEBORAH J. BROYLES  
TIFFANY RENEE THOMAS  
28 Attorney for Defendants  
UNITED AIRLINES INC

1  
2 **IT IS SO ORDERED**  
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5 The Discovery Plan as submitted above is hereby adopted by the Court in addition to the  
6 Case Management and Pretrial Order for Jury Trial dated June 5, 2013.  
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8 DATED: August 23, 2013  
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11 ELIZABETH D. LAPORTE  
12 United States Chief Magistrate Judge  
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