

BETH A. HUBER (SBN 184702)
 THE HUBER LAW FIRM
 807 E St.
 San Rafael, California 94901
 Telephone: (415) 456-4411
 Facsimile: (415) 453-8269
 Email: bhuber@huberlawfirm.net

Attorneys for Plaintiff
 CHRISTINE DANSCUK

DEBORAH J. BROYLES (SBN 167681)
 Email: dbroyles@reedsmith.com
 TIFFANY RENEE THOMAS (SBN 239085)
 Email: tthomas@reedsmith.com
 REED SMITH LLP
 101 Second Street, Ste 1800
 San Francisco, CA 94105-3659
 Telephone: (415) 543-8700
 Facsimile: (415) 391-8269

Attorneys for Defendant
 UNITED AIR LINES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DANSCUK,)	NO. C 12-5875 EDL
)	
Plaintiff,)	JOINT DISCOVERY STATEMENT
)	PURSUANT TO AUGUST 12, 2013 COURT
vs.)	ORDER
)	AND ORDER
UNITED AIR LINES, INC., and DOES 1)	Ctrm: E, 15 th Fl.
through 10, inclusive,)	Judge: Hon. Elizabeth D. Laporte
)	
Defendants.)	

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
21 DATED: August 22, 2013

HUBER LAW FIRM

22 By: 

BETH A. HUBER

Attorney for Plaintiff

CHRISTINE DANSCUK

23
24
25 DATED: August 20, 2013

REED SMITH LLP

26 By: /s/ Tiffany Renee Thomas

DEBORAH J. BROYLES

TIFFANY RENEE THOMAS

Attorney for Defendants

UNITED AIRLINES INC

1
2 **IT IS SO ORDERED**

3 The Discovery Plan as submitted above is hereby adopted by the Court in addition to the
4 Case Management and Pretrial Order for Jury Trial dated June 5, 2013.

5 DATED: August 23, 2013

6 
7 ELIZABETH D. LAPORTE
8 United States Chief Magistrate Judge
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28