

1 Michael F. Ram, CSB #104805
 Email: mram@rocklawcal.com
 2 Susan S. Brown, CSB #287986
 Email: sbrown@rocklawcal.com
 3 Karl Olson, CSB #104760
 Email: kolson@rocklawcal.com
 4 RAM, OLSON, CEREGHINO & KOPCZYNSKI
 5 555 Montgomery Street, Suite 820
 San Francisco, California 94111
 6 Telephone: (415) 433-4949
 Facsimile: (415) 433-7311

7 [Additional Counsel Appear on Signature Page]

8 *Attorneys for Plaintiffs*

10
 11 U.S. DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

13 KEVIN BREAZEALE, KAREN SOLBERG,
 14 KEVIN HIEP VU, NANCY MORIN, and
 15 NARISHA BONAKDAR, on their own behalf
 and on behalf of others similarly situated,

16 Plaintiffs,

17 v.

18 VICTIM SERVICES, INC., d/b/a
 19 CorrectiveSolutions, NATIONAL
 20 CORRECTIVE GROUP, INC., d/b/a
 CorrectiveSolutions, and MATS JONSSON,

21 Defendants.

NO. 3:14-cv-05266-VC

JOINT PROPOSED DISCOVERY PLAN AND ORDER

Honorable Vince Chhabria

CLASS ACTION

23 Plaintiffs Kevin Breazeale, Karen Solberg, Kevin Hiep Vu, Nancy Morin and Narisha
 24 Bonakdar (“Plaintiffs”), and Defendants Victim Services, Inc. (“VS”), National Corrective
 25 Group, Inc. (“NCG”) and Mats Jonsson (“Jonsson”), or collectively, (“Defendants”)) jointly
 26
 27

1 submit this Joint Proposed Discovery Plan pursuant to the Court's September 29, 2015 minute
2 order. (Dkt. No. 85).

3 1. Discovery Plan:

4 The parties agree that: (a) discovery shall not be taken in phases, except that non-expert
5 discovery should be completed before the commencement of expert discovery; (b) non-expert
6 discovery be completed by December 31, 2016; (c) the Court should not modify the Federal
7 Rules of Civil Procedure or the Local Rules of this Court other than the entry, upon review and
8 approval, of a stipulated protective order which the parties will cooperate in drafting; (d) if
9 either party believes that interrogatories or depositions in excess of the number provided in the
10 Federal Rules of Civil Procedure are required, both parties will confer and attempt to reach an
11 agreement; (e) the Court should not consider appointing a special master pursuant to Rule 53 of
12 the Federal Rules of Civil Procedure or an independent scientific expert; (f) Defendants'
13 responses to Plaintiffs' pending written discovery shall be due on or before October 22, 2015;
14 and (g) the parties reserve the right to supplement this discovery plan as to any class
15 certification expert discovery at such time as the Court sets a briefing schedule for a class
16 certification motion.

17 2. Proposed Deadlines and Dates:

18 The parties respectfully propose the following dates:

19 Fact Discovery Cutoff	December 31, 2016
20 Expert Disclosures	90 Days Prior to Trial per FRCP 26(a)(2)(D)(i)
21 Expert Reports	60 Days Prior to Trial
22 Rebuttal Expert Disclosures	30 Days Prior to Trial per FRCP 26(a)(2)(D)(ii)

1
2 RESPECTFULLY SUBMITTED AND DATED this 1st day of October, 2015.

3
4 TERRELL MARSHALL DAUDT
& WILLIE PLLC

FREEDMAN & TAITELMAN, LLP

5 By: /s/ Beth E. Terrell, CSB #178181
6 Beth E. Terrell, CSB #178181
7 Email: bterrell@tmdwlaw.com
8 Blythe H. Chandler, *Admitted Pro Hac*
9 *Vice*
10 Email: bchandler@tmdwlaw.com
11 936 North 34th Street, Suite 300
12 Seattle, Washington 98103-8869
13 Telephone: (206) 816-6603
14 Facsimile: (206) 350-3528

By: /s/ Michael A. Taitelman, CSB #156254
Michael A. Taitelman, CSB #156254
Email: mtaitelman@ftllp.com
Sean M. Hardy, CSB #266446
Email: smhardy@ftllp.com
1901 Avenue of the Stars, Suite 500
Los Angeles, California 90067
Telephone: (310) 201-0005
Facsimile: (310) 201-0045

12 Paul Arons
13 Email: lopa@rockisland.com
14 LAW OFFICE OF PAUL ARONS
15 685 Spring Street, Suite 104
16 Friday Harbor, Washington 98250
17 Telephone: (360) 378-6496
18 Facsimile: (360) 378-6498

*Attorneys for Defendants Victim Services,
Inc., National Corrective Group, Inc., and
Mats Jonsson*

16 Deepak Gupta
17 Email: deepak@guptabeck.com
18 GUPTA BECK PLLC
19 1735 20th Street, NW
20 Washington, DC 20009
21 Telephone: (202) 888-1741
22 Facsimile: (202) 888-7792

21 *Attorneys for Plaintiffs*

24 Date: October 2, 2015

