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21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 SAMARN OLSEN and
25 NEOLANI OLSEN-RODRIGUEZ,
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27 Plaintiffs,
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29 v.
30 UNITED STATES OF AMERICA,
31
32 Defendant.

33) CASE NO. C 14-05601 SI
34)
35) **STIPULATION AND ~~PROPOSED~~**
36) **ORDER TO EXTEND DEADLINE FOR**
37) **DEFENDANT UNITED STATES OF**
38) **AMERICA TO PRODUCE A RULE**
39) **30(B)(6) DESIGNEE**

1 WHEREAS, on October 20, 2015, the Court issued an order granting Plaintiffs' motion to
2 compel Defendant to designate a Rule 30(b)(6) witness (or witnesses) to testify on all topics identified in
3 Plaintiffs' notices not later than October 29, 2015;

4 WHEREAS, six deposition are already scheduled to occur in this matter on October 28 and 29;

5 WHEREAS, the person most knowledgeable about several of the topics listed in Plaintiffs' Rule
6 30(b)(6) notices and whom Defendant anticipates designating as its witness to testify about many if not
7 all of these topics is on annual leave and is out of the country on vacation and will not return to work
8 until the beginning of November 2015;

9 WHEREAS, the cut-off deadline for fact discovery in this matter is not until January 29, 2015;

10 NOW, THEREFORE, the parties hereby stipulate and agree that the deadline for Defendant
11 United States of America to produce a Rule 30(b)(6) designee on the topics set forth in Plaintiffs'
12 notices shall be extended to and include November 30, 2015.

13
14 Respectfully submitted,

15 DATED: October 21, 2015

BRIAN J. STRETCH
Acting United States Attorney

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18 /s/ Mark R. Conrad
MARK R. CONRAD
19 Assistant United States Attorney
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DATED: October 21, 2015

CLAYEO C. ARNOLD
A Professional Law Corporation

/s/ Anthony M. Ontiveros
ANTHONY M. ONTIVEROS
Attorney for Plaintiffs

IT IS SO ORDERED.

Date: 10/29/15



HON. SUSAN ILLSTON
United States District Court Judge