

1 JOSEPH P. RUSSONIELLO (CSBN 44332)
 United States Attorney
 2 JOANN M. SWANSON (CSBN 88143)
 Chief, Civil Division
 3 JENNIFER S WANG (CSBN 233155)
 Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102-3495
 Telephone: (415) 436-6967
 6 Facsimile: (415) 436-6748
 Email: jennifer.s.wang@usdoj.gov

7 Attorneys for the Federal Defendant

8 BAUM & BLAKE
 9 DAVID B. BAUM (State Bar No. 28506)
 MARTIN BLAKE (State Bar No. 98021)
 10 One Sansome Street, Suite 3500
 San Francisco, California 94104
 11 Telephone: (415) 956-5544
 Facsimile: (415) 956-5547
 12 Email: dbb@baumblake.com

13 Attorneys for Plaintiff

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

18 MONICA HOLMES,
 19 Plaintiff,
 20 v.
 21 UNITED STATES OF AMERICA,
 22 Defendant.
 23

No. C 08-5619 PJH (EMC)

**STIPULATION AND [PROPOSED]
 ORDER REGARDING DEADLINE FOR
 DISCOVERY MOTION REGARDING
 PLAINTIFF'S PHONE RECORDS**

24 **STIPULATION**

25 The parties by and through their counsel of record, hereby stipulate and agree as follows:

26 1. In January 2010, the plaintiff agreed to authorize her phone service providers to release
 27 her January 1, 2006 to April 24, 2007 phone records to the defendant. The parties agreed that the
 28 records subpoenaed from plaintiff's phone service providers would be sent to plaintiff's counsel
 to provide plaintiff an opportunity to redact calls with individuals other than Monty Holmes.

1 Plaintiff agreed that within one week of the receipt of the phone records by her counsel, she
2 would provide defendant with the redacted records.

3 2. Plaintiff's counsel has informed defendant that plaintiff needs more time than anticipated
4 to complete the redactions. Plaintiff's counsel has informed defendant's counsel that he expects
5 to produce the redacted phone records to defendant by the beginning of the week of April 12,
6 2010.


7 3. Pursuant to the Court's February 12, 2010 Order, the fact discovery cut-off in the above-
8 captioned case was April 5, 2010. Pursuant to Local Rule 26-2, April 12, 2010 is the last day to
9 file motions to compel fact discovery.

10 4. Subject to the Court's approval, the parties, through their undersigned counsel, hereby
11 agree and stipulate to extend the deadline to file a motion to compel related to plaintiff's phone
12 records to April 30, 2010.

13 IT IS SO ORDERED.


14 Respectfully submitted,
15 JOSEPH P. RUSSONIELLO
United States Attorney

16 Dated: April 13, 2010

 for Jennifer
17 JENNIFER S WANG
Assistant United States Attorney
18 Attorneys for Defendant
19 Wang

20 BAUM & BLAKE

21 Dated: April 12, 2010


22 DAVID B. BAUM
23 MARTIN BLAKE
Attorneys for Plaintiff

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[PROPOSED] ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is hereby ordered that the deadline to file a motion to compel related to plaintiff's phone records is April 30, 2010.

IT IS SO ORDERED.

4/16/10

