

**P O R T E R | S C O T T**

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Attorneys for Defendant COUNTY OF LAKE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
EUREKA DIVISION**

MICHAEL MORSHED,

Case No.: 4:13-cv-00521-YGR-NJV

Plaintiff,

**[PROPOSED] DISCOVERY ORDER**

vs.

Trial Date: June 9, 2014

Time: 8:30 a.m.

Location: Courtroom 1

COUNTY OF LAKE,

Date Action Filed: February 6, 2013

Defendant.

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This matter came on specially for telephone hearing regarding Plaintiff's letter dated May 28, 2014. Jocelyn Burton and Joel Moon appeared for Plaintiff Michael Morshed. John Whitefleet and Lauren Calnero appeared for Defendant County of Lake, California.

**REQUEST NO. 1:**

Defendant is precluded from offering into evidence or referring to any and all documents responsive to this request that were not previously produced.

1 **REQUEST NO. 5**

2 Defendant is precluded from offering into evidence or referring to any and all documents  
3 responsive to this request that were not previously produced.

4 **REQUEST NO. 7:**

5 Defendant is hereby ordered to produce and deliver documents in connection with its response  
6 to Request for Production No. 49 to Plaintiff no later than Wednesday, June 4, 2014 at 4:00 p.m.

7 **REQUEST NO. 8:**

8 Defendant is hereby ordered to produce and deliver documents in connection with its response  
9 to Request for Production No. 49 to Plaintiff no later than Wednesday, June 4, 2014 at 4:00 p.m.

10 **REQUEST NO. 12:**

11 Defendant is hereby ordered to produce and deliver documents in connection with its response  
12 to Request for Production No. 49 to Plaintiff no later than Wednesday, June 4, 2014 at 4:00 p.m.

13 **REQUEST NO. 17:**

14 Defendant is precluded from offering into evidence or referring to any and all documents  
15 responsive to this request that have not previously been produced.

16 **REQUEST NO. 43:**

17 Defendant is precluded from offering into evidence or referring to any and all documents  
18 responsive to this request that have not previously been produced.

19 **REQUEST NO. 46:**

20 Defendant is hereby ordered to produce and deliver documents responsive to Request for  
21 Production No. 49 to Plaintiff no later than Wednesday, June 4, 2014 at 4:00 p.m.

22 **REQUEST NO. 49:**

23 Defendant is hereby ordered to produce and deliver documents responsive to Request for  
24 Production No. 49 to Plaintiff no later than Wednesday, June 4, 2014 at 4:00 p.m.

25 **REQUEST NO. 51:**

26 Defendant is hereby ordered to produce and deliver documents responsive to this request, to the  
27 extent any exist, and/or produce a privilege log to Plaintiff no later than Wednesday, June 4, 2014 at  
28 4:00 p.m. Plaintiff will have until Thursday, June 5, 2014 at 12:00 p.m. to file a response, if necessary.

1 The Court will then address this matter on Friday, June 6, 2014 at 10:00 a.m., through a telephonic  
2 conference, if necessary.

3 **REQUEST NO. 53:**

4 Defendant is precluded from offering into evidence or referring to any and all documents  
5 responsive to this request that have not previously been produced.

6 **REQUEST NO. 54:**

7 Defendant is precluded from offering into evidence or referring to any and all documents  
8 responsive to this request that have not previously been produced.

9 **REQUEST NO. 55:**

10 Defendant is precluded from offering into evidence or referring to any and all documents  
11 responsive to this request that have not previously been produced.

12 **REQUEST NO. 56:**

13 Defendant is precluded from offering into evidence or referring to any and all documents  
14 responsive to this request that have not previously been produced.

15 **REQUEST NO. 57:**

16 Defendant is precluded from offering into evidence or referring to any and all documents  
17 responsive to this request that have not previously been produced.

18 **REQUEST NO. 59:**

19 Defendant is precluded from offering into evidence or referring to any and all documents  
20 responsive to this request that have not previously been produced.

21 **REQUEST NO. 60:**

22 Defendant is precluded from offering into evidence or referring to any and all documents  
23 responsive to this request that have not previously been produced.

24 **REQUEST NO. 64:**

25 Defendant is precluded from offering into evidence or referring to any and all documents  
26 responsive to this request that have not previously been produced.

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**REQUEST NO. 67:**

Defendant is precluded from offering into evidence or referring to any and all documents responsive to this request that have not previously been produced.

**REQUEST NO. 68:**

Defendant is precluded from offering into evidence or referring to any and all documents responsive to this request that have not previously been produced.

**REQUEST NO. 69:**

Defendant is precluded from offering into evidence or referring to any and all documents responsive to this request that have not previously been produced.

**IT IS SO ORDERED.**

Dated: June 3, 2014

