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1 IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this 2 action, through their respective counsel of record, as follows: 3 Discovery closed on September 16, 2014, and pursuant to the relevant local rule of court 4 the current deadline to file discovery motions is September 23, 2014. Plaintiff and Defendants 5 are meeting and conferring regarding: Plaintiff's responses to Defendants' written discovery; Plaintiff's responses to the request for production of documents served with his deposition 6 7 notice, and Defendants' responses to Plaintiff's request for production of documents. The 8 parties respectfully request an extension of the deadline to file joint letter briefs in connection 9 with the disputed discovery to September 30, 2014. 10 There is good cause for the extension because the responses at issue were only recently 11 received by counsel for the respective parties. The parties are attempting to meet and confer in an effort to narrow the issues and to resolve the matter informally without this Court's 12 13 intervention. The five court-day extension will not have any effect on the upcoming court 14 deadlines or the trial date. IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD. 15 16 LAW OFFICE OF JIVAKA CANDAPPA 17 DATED: September 22, 2014 Jivaka Candappa, Attorney for Plaintiff 18 HOWARD ROME MARTIN & RIDLEY, LLP 19 DATED: September 22, 2014 By: __ 20 Joseph C. Howard, Jr. Todd H. Master 21 Melissa M. Holmes 22 Attorneys for Defendants 23 24 25 26 27 28

STIPULATION AND [PROPOSED] ORDER EXTENDING THE DEADLINE TO FILE JOINT LETTER BRIEFS TO COMPEL, IF NECESSARY.

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ORDER PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED THAT: the deadline for bringing joint letter briefs to compel is extended from September 23, 2014 to September 30, 2014. The parties are cautioned that the court will not be hearing motions to compel on shortened time based on the imminent IT IS SO ORDERED. deadline for filing dispositive motions. Dated: September 22, 2014 HON. DONNA M. RYU UNITED STATES MAGISTRATE JUDGE

STIPULATION AND [PROPOSED] ORDER EXTENDING THE DEADLINE TO FILE JOINT LETTER BRIEFS TO COMPEL, IF NECESSARY.

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