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 14 SECURITY SERVICES

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **OAKLAND DIVISION**

18 UNIVERSAL PROTECTION
 19 SERVICE, LP d/b/a ALLIED
 20 UNIVERSAL SECURITY
 21 SERVICES,

22 Plaintiff,

23 v.

24 AVE SELTSAM,

25 Defendant.

CASE NO.: 4:22-cv-04927-HSG

**STIPULATED ORDER GRANTING
 PLAINTIFF'S MOTION FOR
 EXPEDITED DISCOVERY**

1 Before this Court is the Plaintiff's Motion for Expedited Discovery (the
2 "Motion"), seeking expedited discovery. Upon the stipulation and agreement of
3 Plaintiff and Defendant Ave Seltsam ("Defendant") (collectively, the "Parties"),
4 the Court hereby grants Plaintiff's Motion.

5 Accordingly, IT IS HEREBY ORDERED:

- 6 1. Plaintiff shall be entitled to notice, schedule, and take the deposition
7 of Ave Seltsam ("Seltsam") within fourteen (14) days of the Court's
8 order regarding expedited discovery and, if necessary, prior to
9 Defendant Seltsam's appearance date.
- 10 2. Plaintiff shall be entitled to take and complete the depositions of
11 Defendant Seltsam and the corporate representative of GardaWorld
12 prior to the initiation of any other depositions in this matter.
- 13 3. Plaintiff shall be entitled to issue a subpoena duces tecum and ad
14 testificandum to Defendant's current employer, GardaWorld.
- 15 4. Defendant Seltsam shall be permitted to take a deposition of a
16 corporate representative of Plaintiff.
- 17 5. The Parties may serve no more than ten (10) requests for production
18 of documents and five (5) interrogatories on each other. Defendant
19 must serve any objections to Plaintiff's First Requests for Production
20 of Documents and First Set of Written Interrogatories to Defendant
21 ("Plaintiff's Written Discovery") upon counsel for Plaintiff by
22 Monday, September 19, 2022. Responses to Plaintiff's Written
23 Discovery must be served upon counsel for Plaintiff by Wednesday,
24 September 21, 2022. Any objections and/or responses to any other
25 discovery requests shall be due no later than seven (7) calendar days
26 after service of such discovery requests.

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6. The Parties may serve written discovery, deposition notices, and any other discovery material by hand delivery, regular mail, expedited mail, facsimile, or electronic mail, and the party serving such material shall be deemed to have effectuated service in accordance with the Federal Rules of Civil Procedures on the day of its receipt of the material so long as the material is received no later than 5:00 pm pacific time.

SIGNED this 19th day of September, 2022.



Hon. Haywood S. Gilliam, Jr.
United States District Court for the
Northern District of California