

1 RICHARD DOYLE, City Attorney (#88625)  
NORA FRIMANN, Chief Trial Attorney (#93249)  
2 ROBERT BURCHFIEL, Sr. Deputy City Attorney (#112318)  
Office of the City Attorney  
3 200 East Santa Clara Street  
San José, California 95113-1905  
4 Telephone Number: (408) 535-1900  
Facsimile Number: (408) 998-3131  
5 E-Mail Address: cao.main@sanjoseca.gov

6 Attorneys for Defendant, CITY OF SAN JOSE

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
COUNTY OF SANTA CLARA  
SAN JOSE DIVISION

CHIN-LI MOU,  
  
Plaintiff,  
  
v.  
  
CITY OF SAN JOSE, SAN JOSE PUBLIC  
LIBRARY EDUCATION PARK BRANCH,  
  
Defendants.

Case Number: C07-05740 JF  
  
**DEFENDANT CITY OF SAN JOSE'S  
DISCOVERY PLAN**  
  
Date: September 24, 2008  
Time: 9:30 a.m.  
Courtroom: 4, 5<sup>th</sup> Floor  
Judge: Magistrate Seeborg

Defendant City of San Jose recommends the following discovery plan for this matter:

- (1) Written Interrogatories: 25
- (2) Production of Documents: 10
- (3) Depositions: 10

Any party may seek leave of Court to conduct discovery beyond these limits.

Defendant City of San Jose recommends that fact discovery be completed by January 30, 2009.

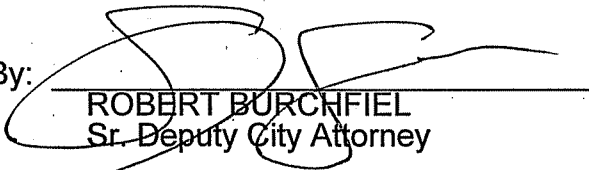
/////  
/////

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Judge Jeremy Fogel has continued the Case Management Conference hearing to  
October 10, 2008 at 10:30 a.m.

Dated: September 15, 2008

Respectfully submitted,  
RICHARD DOYLE, City Attorney

By:   
ROBERT BURCHFIEL  
Sr. Deputy City Attorney

Attorneys for Defendant,  
CITY OF SAN JOSE

**PROOF OF SERVICE**

CASE NAME: Mou v. CSJ, et al.

CASE NO.: C07-05740 RS

I, the undersigned declare as follows:

I am a citizen of the United States, over 18 years of age, employed in Santa Clara County, and not a party to the within action. My business address is 200 East Santa Clara Street, San Jose, California 95113-1905, and is located in the county where the service described below occurred.

On September 16, 2008 I caused to be served the within:

**DEFENDANT CITY OF SAN JOSE'S DISCOVERY PLAN**

by MAIL, with a copy of this declaration, by depositing them into a sealed envelope, with postage fully prepaid, and causing the envelope to be deposited for collection and mailing on the date indicated above.

I further declare that I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. Said correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business.

Addressed as follows:

Ms. Chin-Li Mou  
4141 Boneso Circle  
San Jose, CA 95134  
Phone Number: (408) 954-8085  
E-Mail: cmou@hotmail.com

*In Propria Persona*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 16, 2008 at San Jose, California.



Cecilia McDaniel