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10 Attorneys for Defendant, CITY OF SAN JOSE

11
12 UNITED STATES DISTRICT COURT
13 COUNTY OF SANTA CLARA
14 SAN JOSE DIVISION

15 CHIN-LI MOU,

16 Plaintiff,

17 v.

18 CITY OF SAN JOSE, SAN JOSE PUBLIC
19 LIBRARY EDUCATION PARK BRANCH,

20 Defendants.

Case Number: C07-05740 JF

**PROPOSED JOINT DISCOVERY
PLAN**

21 1. Pursuant to Fed. R. Civ. P. 26(f), the parties to the above-entitled action,
22 Plaintiff Chin-Li Mou, in pro se, and Shannon Smyth-Mendoza, Deputy City Attorney on
23 behalf of Defendants, met and conferred on September 24, 2008 at approximately
24 10:00 a.m. to develop a proposed joint discovery plan.

25 2. Discovery Plan. The parties jointly propose to the Court the following
26 discovery plan:

27 A. Maximum of 25 interrogatories by each party to any other party.

28 Responses due per FRCP.

B. Depositions to be taken as indicated by FRCP Rule 30. Plaintiff's

Deposition is scheduled for October 10, 2008 and shall be with a

Mandarin language interpreter.

1 C. Production of Documents: Unlimited relevant production request by each
2 party to any other party. Responses due per FRCP.

3 D. The parties agree to service of discovery requests on Plaintiff by e-mail
4 and U.S. Mail.

5 Defendant City of San Jose recommends that fact discovery be completed by
6 January 30, 2009. Plaintiff Mou recommends that fact discovery be completed by
7 July 31, 2009.

8 Plaintiff Mou requests that no more than two (2) discovery requests be served on
9 her and due at any given point. Defendant City of San Jose objects to this request.

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

11 The parties request a conference with the Court before entry of the scheduling
12 order.

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

15
16 Respectfully submitted,

17 Dated: October 9, 2008

RICHARD DOYLE, City Attorney

18
19 By: 

ROBERT BURCHFIEL
Sr. Deputy City Attorney

20
21 Attorneys for Defendant,
22 CITY OF SAN JOSE

23
24 Dated: October 9, 2008


25 CHIN-LI MOU
26 Plaintiff, In Pro Se
27
28

1 **PROOF OF SERVICE**

2 CASE NAME: *Mou v. CSJ, et al.*

3 CASE NO.: C07-05740 RS

4 I, the undersigned declare as follows:

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

9 On October 9, 2008 I caused to be served the within:

10 **PROPOSED JOINT DISCOVERY PLAN**

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

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

18 by E-MAIL.

19 Addressed as follows:

20 Ms. Chin-Li Mou
21 4141 Boneso Circle
22 San Jose, CA 95134
23 Phone Number: (408) 954-8085
24 E-Mail: cmou@hotmail.com

25 *In Propria Persona*

26 I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct. Executed on October 9, 2008 at San Jose, California.

28 
Cecilia McDaniel