

1 TONY WEST
 Assistant Attorney General
 2 PHYLLIS J. PYLES
 Director, Torts Branch
 3 SUSAN K. RUDY
 Assistant Director, Federal Programs Branch
 4 VESPER MEI (D.C. Bar #455778)
 Senior Counsel, Federal Programs Branch
 5 KAREN P. SEIFERT (N.Y. Bar)
 Trial Attorney, Federal Programs Branch
 6 J. STEVEN JARREAU (D.C. Bar #414135)
 Trial Attorney, Torts Branch
 7 United States Department of Justice
 Civil Division
 8 P.O. Box 883 – Room 7316
 Washington, DC 20044
 9 Telephone: (202) 514-4686
 Facsimile: (202) 616-8470
 10 vesper.mei@usdoj.gov
 karen.p.seifert@usdoj.gov
 11 steven.jarreau@usdoj.gov
Attorneys for Defendants

12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN JOSE DIVISION**

15 HAIPING SU,
 16 Plaintiff,

17 v.

18 NATIONAL AERONAUTICS AND
 SPACE ADMINISTRATION, et al.
 19 Defendants.

Case No. 5:09-cv-2838-JW

STIPULATION AND ~~PROPOSER~~
ORDER FOR A LIMITED EXTENSION
OF DISCOVERY DEADLINE
RELATED TO DEFENDANTS'
REQUESTS FOR ADMISSION, SET
ONE

21 On February 25, 2011, defendants served plaintiff's counsel with Defendants' Requests
 22 for Admission to Plaintiff, Set One ("RFAs"). Plaintiff's counsel responded to those Requests
 23 on March 28, 2011, which was also the court-ordered date for the close of discovery. Pursuant to
 24 Civil Local Rule 37-3, defendants must file any motion to compel with respect to these RFAs by
 25 April 4, 2011.
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27 On March 31, 2011, defendants' counsel emailed counsel for plaintiff, pointing out
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1 perceived deficiencies in a number of plaintiff's responses to the RFAs, and seeking revised
2 responses. On April 2, plaintiff's counsel agreed to revise or supplement some of the responses
3 to the RFAs, and agreed to do so by April 11, 2011, with a corresponding extension until April
4 18, 2011, of the date for defendants to file any motion to compel based on these responses.

5 To date, the discovery deadlines in this matter have been modified as follows: On
6 January 25, 2011, the Court modified the expert discovery deadlines upon joint stipulation of the
7 parties, setting February 7, 2011 as the deadline for disclosure of experts and March 7, 2011 as
8 the deadline for disclosure of rebuttal experts. Docket Entry #131. On March 23, 2011, the
9 Court extended until April 28, 2011, the deadline for certain depositions and the submission of
10 rebuttal expert testimony by defendants, if necessary, pending decisions on Defendants' Motion
11 to Compel and Motion to Strike Expert Report. Docket Entry #157. On March 24, 2011, the
12 Court extended the discovery deadline for the limited purpose of allowing defendants extra time
13 to respond to certain of plaintiff's written discovery requests, and the filing of any resulting
14 motions to compel. Docket Entry #158. Also on March 24, 2011, the Court extended the
15 discovery deadline to allow the deposition of one additional fact witness on April 11, 2011.
16 Docket Entry #159.

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19 The requested modification would have minimal impact on the case. Plaintiff seeks
20 additional time to revise his RFA responses, as necessary. Defendants seek additional time to
21 file any resulting motion to compel. The parties do not believe the additional period of discovery
22 will impact other discovery matters in this case.

23
24 Accordingly, the parties hereby STIPULATE AND REQUEST that the March 28, 2011
25 deadline for discovery be extended for the limited purpose of the aforementioned productions, as
26 follows:

27 April 11, 2011 Production of any revised responses to Defendants' RFAs to

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Plaintiff, Set One

April 18, 2011

Any motion to compel discovery for responses to Defendants' RFAs to Plaintiff, Set One

DATED: 4/4/2011

/s/ Michael Reedy
JAMES MCMANIS (40958)
MICHAEL REEDY (161002)
TYLER ATKINSON (257997)
McMANIS FAULKNER
A Professional Corporation
50 West San Fernando Street, 10th Floor
San Jose, California 95113
Telephone: 408-279-8700
Facsimile: 408-279-3244
Email: mreedy@mcmanislaw.com
Attorneys for Plaintiff

/s/ Vesper Mei
TONY WEST
Assistant Attorney General
PHYLLIS J. PYLES
Director, Torts Branch
SUSAN K. RUDY
Assistant Director, Federal Programs Branch
VESPER MEI (D.C. Bar #455778)
Senior Counsel, Federal Programs Branch
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Telephone: (202) 514-4686
Facsimile: (202) 616-8470
vesper.mei@usdoj.gov
karen.p.seifert@usdoj.gov
steven.jarreau@usdoj.gov
Attorneys for Defendants

~~PROPOSED~~ **ORDER**

Pursuant to the stipulation of the parties and good cause appearing, IT IS SO ORDERED.

Dated: April 15, 2011, 2011


JAMES WARE
UNITED STATES DISTRICT COURT CHIEF JUDGE