

1 MELINDA HAAG (CSBN 132612)
 United States Attorney
 2 ALEX TSE (CSBN 152348)
 Chief, Civil Division
 3 CLAIRE T. CORMIER (CSBN 154364)
 Assistant United States Attorney

4 150 Almaden Blvd., Suite 900
 5 San Jose, California 95113
 Telephone: (408) 535-5082
 6 FAX: (408) 535-5081
 Claire.Cormier@usdoj.gov

7 Attorneys for Defendant
 8 Raymond LaHood,
 Secretary, United States Department of Transportation
 9

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

13 BOBBY SANDERS,)	Case No. CV 11-04391 EJD (HRL)
14 Plaintiff,)	STIPULATION AND [PROPOSED]
15 v.)	ORDER EXTENDING DEADLINE FOR
16 RAYMOND LAHOOD, SECRETARY,)	FACT DISCOVERY MOTIONS
17 UNITED STATES DEPARTMENT OF)	
18 TRANSPORTATION,)	
19 Defendant.)	

20
 21 The fact discovery cutoff for this case is March 14, 2013. Accordingly, pursuant to Civil
 22 Local Rule 37-3, the deadline for filing motions to compel fact discovery is March 21, 2013.

23 Plaintiff has recently retained new counsel. On March 11, 2013, plaintiff's counsel sent a
 24 meet and confer letter to defendant's counsel relating to some previous discovery responses by
 25 defendant. In addition, defendant's counsel pointed out some discovery to plaintiff, responses to
 26 which are overdue.

27 In order to allow for the parties and counsel sufficient time to properly meet and confer
 28 and attempt to resolve these matters without intervention by the Court, the parties HEREBY

1 STIPULATE AND REQUEST that the deadline for filing motions to compel fact discovery¹ be
2 extended to April 11, 2013.

3 IT IS SO STIPULATED.

4 Respectfully submitted,

5 DATED: March 13, 2013

THE VAUGHN LAW FIRM, LLC

6 /s/ Christopher D. Vaughn
7

8 Christopher D. Vaughn
Attorney for Plaintiff

9 DATED: March 13, 2013

MELINDA HAAG
United States Attorney

10
11 /s/ Claire T. Cormier

12 By: CLAIRE T. CORMIER²
Assistant United States Attorney

13
14
15 **[PROPOSED] ORDER**

16 IT IS SO ORDERED.

17
18
19 DATED: March 14, 2013


Edward J. Davila
United States District Judge

20
21
22
23
24

25 ¹ The parties note that, because this case has been assigned to Magistrate Judge Howard
26 Lloyd for discovery purposes, the actual procedure for Court intervention would be a Discovery
27 Dispute Joint Report to Judge Lloyd, rather than a motion to compel.

28 ² I, Claire T. Cormier, hereby attest that I have been authorized to submit the electronic
signatures indicated by a “conformed” signature (/s/) within this e-filed document.