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 8 Raymond LaHood,  
 Secretary, United States Department of Transportation  
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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,	)	
15 v.	)	<b>STIPULATION AND <del>PROPOSED</del></b>
16 RAYMOND LAHOOD, SECRETARY,	)	<b>ORDER EXCUSING COUNSEL FROM</b>
17 UNITED STATES DEPARTMENT OF	)	<b>IN-PERSON MEET AND CONFER</b>
18 TRANSPORTATION,	)	<b>REQUIREMENT</b>
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 have submitted

1 to Judge Davila a stipulation and proposed order extending the deadline for motions to compel  
2 fact discovery.

3 This case is assigned to Magistrate Judge Howard Lloyd for discovery purposes.  
4 Accordingly, Judge Lloyd's Discovery Dispute Joint Report procedures would apply to this case.  
5 Because plaintiff's attorney's office is in Decatur, Georgia, the parties HEREBY STIPULATE  
6 AND REQUEST that they be excused from the requirement for in-person meet and confer prior  
7 to the submission of a Discovery Dispute Joint Report. Instead, the parties propose that they be  
8 required to participate in telephone meet and confer prior to the submission of a Discovery  
9 Dispute Joint Report.

10 IT IS SO STIPULATED.

11 Respectfully submitted,  
12 DATED: March 13, 2013 THE VAUGHN LAW FIRM, LLC

13 /s/ Christopher D. Vaughn  
14 \_\_\_\_\_  
15 Christopher D. Vaughn  
Attorney for Plaintiff

16 DATED: March 13, 2013 MELINDA HAAG  
17 United States Attorney

18 /s/ Claire T. Cormier  
19 By: \_\_\_\_\_  
20 CLAIRE T. CORMIER<sup>1</sup>  
Assistant United States Attorney

21 ~~PROPOSED~~ ORDER

22 IT IS SO ORDERED.

23  
24  
25 DATED: March 15, 2013  
26 \_\_\_\_\_  
HOWARD E. LLOYD  
United States Magistrate Judge

27  
28 <sup>1</sup> 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.