

LOVELACE AND ASSOCIATES, P.A.

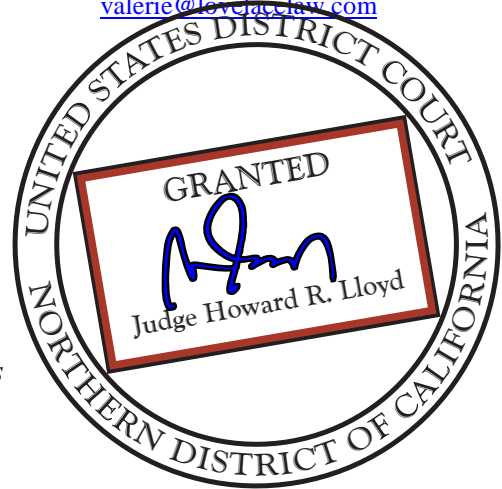
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July 25, 2014

The Honorable Howard R. Lloyd
United States Magistrate Judge
San Jose Courthouse, Courtroom 2-5th Floor
280 South 1st Street
San Jose, California 95113



Re: *Chris Werdebaugh v. Blue Diamond Growers*
Civil Action No. 5:12-CV-02724

Dear Judge Lloyd:

The parties are in receipt of the Court's Order Re Discovery Dispute Joint Report No. 2 (Doc. # 144). Pursuant to the Order, counsel for Plaintiff is making efforts to schedule a further meet and confer session with counsel for Defendant so that meaningful negotiation may take place regarding the discovery requests at issue in this litigation. However, counsel for Defendant has informed counsel for Plaintiff that the earliest they can meet and confer is July 28, 2014, and fact discovery closes in this case on August 1, 2014.

In the event of an unsatisfactory result in the upcoming meet and confer session, Plaintiff seeks leave of Court to file five (5) additional pages in DDJR # 3 in order to fully address the specific arguments and assertions of Defendant as to the discovery it is willing to provide and the discovery which it is not willing to provide. Plaintiff makes this request prior to the meet and confer session with Defendant because time is of the essence, with expert reports due to be filed on August 15, 2014.

Thank you for your consideration of this matter.

Respectfully submitted,

Dewitt M. "Sparky" Lovelace

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cc: All counsel of record