

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY: Joshua Robert Dale Michel & Associates, PC 180 E. Ocean Blvd., Suite 200 Long Beach, CA 90802  TELEPHONE NO.: 562-216-4444 E-MAIL ADDRESS (Optional): jdale@michellawyers.com ATTORNEY FOR (Name): Plaintiff, Michele Hanisee	STATE BAR NUMBER 209942  FAX NO. (Optional): 562-216-4445	Reserved for Clerk's File Stamp  <b>Electronically FILED by  Superior Court of California,  County of Los Angeles  4/10/2024 3:58 PM  David W. Slayton,  Executive Officer/Clerk of Court,  By M. Gonzalez, Deputy Clerk</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b>		
COURTHOUSE ADDRESS: 111 N. Hill St., Los Angeles, CA 90012		
PLAINTIFF: Michele Hanisee		CASE NUMBER: 23STCV07718
DEFENDANT: State of California		
<b>STIPULATION – DISCOVERY RESOLUTION</b>		

**This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.**

**The parties agree that:**

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
  - a. The party requesting the Informal Discovery Conference will:
    - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
    - ii. Include a brief summary of the dispute and specify the relief requested; and
    - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
  - b. Any Answer to a Request for Informal Discovery Conference must:
    - i. Also be filed on the approved form (copy attached);
    - ii. Include a brief summary of why the requested relief should be denied;

- iii. Be filed within two (2) court days of receipt of the Request; and
  - iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing.
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.
4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.
5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.
- It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a “specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing,” within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).
6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
8. References to “days” mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.

**The following parties stipulate:**

Date: April 5, 2024  
 Joshua Robert Dale

(TYPE OR PRINT NAME)

Date: April 9, 2024  
 Laura J. Lively

(TYPE OR PRINT NAME)

Date:  
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 (ATTORNEY FOR PLAINTIFF)

➤ /s/ Laura Lively  
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 (ATTORNEY FOR DEFENDANT)

➤ \_\_\_\_\_  
 (ATTORNEY FOR DEFENDANT)

➤ \_\_\_\_\_  
 (ATTORNEY FOR DEFENDANT)

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 (ATTORNEY FOR \_\_\_\_\_)

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 (ATTORNEY FOR \_\_\_\_\_)

➤ \_\_\_\_\_  
 (ATTORNEY FOR \_\_\_\_\_)