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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

JENNIFER FLETCHER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
STATE OF ALASKA,	)	
	)	CIVIL ACTION
Defendant.	)	
	)	CASE NO. 1:18-cv-00007-HRH
_____	)	

**STIPULATION TO EXTEND DISCOVERY DEADLINE**

Pursuant to Section IV. H. of the Scheduling and Planning Order entered by the Court on September 12, 2018 (Docket No. 17), Defendant State of Alaska, by and through the office of the Attorney General, and Plaintiff, by and through counsel, hereby stipulate to a two-month extension to the discovery deadline as follows:

- A. The current deadline for the completion of discovery is May 1, 2019;
- B. The Plaintiff propounded discovery on the State on October 17, 2018, consisting of interrogatories, requests for admissions, and requests for production;
- C. The State has provided responses to the interrogatories and request for admissions;
- D. The State initially identified in excess of 60,000 documents that may be responsive to Plaintiff’s requests for production consisting of well over 100,000 pages that required review;
- E. The parties have cooperated on a rolling document production schedule and—as of the date of this stipulation—the State has produced in excess of 50,000 pages of documents;
- F. The State still has approximately 16,000 documents to review, primarily consisting of electronic communications and attachments;

- G. The State has been supplementing its production approximately every three weeks;
- H. The State estimates it can complete its document review in approximately six weeks;
- I. The State propounded discovery on Plaintiff on March 26, 2019, consisting of interrogatories, requests for admissions, and request for production;
- J. The deadline for Plaintiff's response to this discovery has not come due yet;
- K. The parties require additional time to review the discovery responses to determine if supplemental discovery is necessary;
- L. The parties agree to extend the discovery deadline for two months;
- M. The new discovery deadline is July 1, 2019;
- N. Both parties anticipate that there may be a further need to move the Court, or request a discovery conference, to request additional time after the parties have completed their document productions. The parties have engaged in preliminary discussions about proposals to streamline resolution of certain issues in the case, including potential liability, and will be in a better position to assess those proposals once document productions are complete. The parties are committed to continuing to confer in good faith about these issues, and reserve the right to seek further relief from the Court with respect to the discovery deadline and case schedule as soon as they can have more developed discussions about these matters.

DATED: April 17, 2019.

By: /s/ Peter C. Renn  
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## CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2019, a copy of the foregoing was served electronically via ECF on the following parties of record pursuant to the Court's electronic filing procedures:

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