

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

| | | |
|------------------------|---|---------------------------|
| JONATHAN LANGLEY, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 1:18-cv-00443-LY |
| |) | |
| INTERNATIONAL BUSINESS |) | |
| MACHINES CORPORATION, |) | |
| |) | |
| Defendant. |) | |
| |) | |

**[PROPOSED] ORDER GRANTING DEFENDANT INTERNATIONAL
BUSINESS MACHINES CORPORATION’S MOTION TO
COMPEL DEPOSITION TESTIMONY AND FOR SANCTIONS**

Before the Court is Defendant International Business Machines Corporation’s Motion to Compel Deposition Testimony and for Sanctions. The Court has considered Defendant’s Motion, Plaintiff’s Response and Defendant’s Reply and finds that the Motion should be **GRANTED**.

Accordingly, it is **ORDERED** that the parties shall reconvene for the continuation of Plaintiff Jonathan Langley’s deposition at the earliest practical mutually agreed date, and at a mutually agreed time and location. At this reconvened deposition, Plaintiff Langley shall fully answer Defendant IBM’s deposition questions regarding the identities of individuals with whom he has spoken since leaving the Company and the identities of individuals who provided him with copies of documents that he seeks to rely upon in this matter, as well as all other questions permitted by the Federal Rules of Civil Procedure. To complete the deposition, Defendant IBM may have the time remaining under Rule 30(d)(1) plus an additional three hours.

It is further **ORDERED** that Plaintiff Langley shall pay all reasonable fees, costs, and expenses that Defendant will incur from the reconvened deposition, including attorneys’ fees,

travel expenses, and other costs. In addition, Plaintiff Langley shall pay all reasonable fees, costs and expenses that Defendant IBM incurred in connection with the filing of the Motion to Compel Deposition Testimony and for Sanctions and its Reply in support thereof. Defendant IBM shall file an accounting of such costs and fees within thirty (30) days of the completion of the reconvened deposition.

IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE