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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10 **FRESNO DIVISION**

12 U.S. EQUAL EMPLOYMENT
13 OPPORTUNITY COMMISSION,

14 Plaintiff,

15 v.

17 TIMELESS INVESTMENTS, INC. dba)
18 EZ TRIP GOLDEN STATE SHELL,)
19 DOES 1 -10, inclusive,)

20 Defendant.

Case No.: 1:08-CV-01469 AWI (SMS)

13 } **STIPULATION TO CONTINUE**
14 } **THE DUE DATE OF THE**
15 } **CONSENT DECREE; AND ORDER**

17 Hon. Sandra M. Snyder
18 U.S. Magistrate Judge

22
23 **TO THE HONORABLE SANDRA M. SNYDER:**

24 Counsel for Plaintiff U.S. Equal Employment Opportunity Commission
25 ("EEOC") and Defendant Timeless Investments, Inc. dba EZ Trip Golden State Shell
26 ("Defendant"), by and through their undersigned counsels, request that this Court
27 continue the due date of the consent decree from October 22, 2010 to forty-five to
fifty (45-50) days.

YARRA, KHARAZI
& ASSOCIATES
1250 Fulton Mall
Fresno, CA 93721

1 On August 31, 2010, the parties appeared before this Court for a settlement
2 conference and settled the case. A part the settlement includes the filing of a Consent
3 Decree (“Decree”). The Court ordered the parties to submit the Decree by October
4 22, 2010.

5 The parties are working diligently towards finalizing the Decree. A second
6 draft of the Decree was distributed by the EEOC to Defendant on or about October 12,
7 2010. According to Defendant’s counsel, he was engaged in a jury trial during
8 October 8-15th at Fresno County Superior Court. Therefore, Defendant’s counsel was
9 unable to review the Decree until October 18th because of his trial schedule.

10 On October 18, 2010 a set of revisions were proposed by Defense to the
11 Plaintiff. The parties are very close.

12 After taking into consideration the counsels’ schedule and the issues to be
13 resolved, the parties jointly and respectively ask for an additional forty-five to fifty
14 (45-50) days to complete this work. The parties anticipate that the details can be
15 worked out within that time frame and the Decree will be filed.

16 Therefore, the parties are asking for an extension from October 22, 2010 to
17 forty-five to fifty (45-50) days to file the Consent Decree.

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19 SO STIPULATED.

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22 Date: October 19, 2010

23 Respectfully submitted,
24 U.S. EQUAL EMPLOYMENT
25 OPPORTUNITY COMMISSION
26 /s/ Lorena Garcia-Bautista
27 _____
28 Anna Y. Park
29 Lorena Garcia-Bautista
30 Amrita Mallik
31 Attorneys for Plaintiff U.S. EEOC

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YARRA, KHARAZI, & ASSOCIATES

/s/ H. Ty Kharazi

Date: October 19, 2010

By: _____

H. Ty Kharazi
Attorney for Defendant
Timeless Investments, Inc., et al.

ORDER

GOOD CAUSE APPEARING, IT IS ORDERED THAT the parties must submit the Consent Decree by on or before **December 13 , 2010.**

Dated: October 20, 2010

_____/s/ Sandra M. Snyder

UNITED STATES MAGISTRATE JUDGE