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6 Attorneys for Defendant GIUMARRA VINEYARDS CORPORATION

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UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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Equal Employment Opportunity Commission,) CASE NO. 1:09-CV-02255-OWW-SMS

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Plaintiff,)

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v.)

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Delfina Ochoa, Maribel Ochoa, Jose Ochoa,)
15 and Guadalupe Martinez,)

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Plaintiffs/Intervenors.)

The Honorable Michael J. Seng
U.S. Magistrate Judge

17

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v.)

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Giumarra Vineyards Corporation,)

ACTION FILED: 2/9/10
TRIAL DATE: 11/15/11

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Defendants.)

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TO THE HONORABLE COURT AND TO ALL PARTIES OF AND COUNSEL OF

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RECORD:

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Plaintiff-Intervenors and Defendant have a scheduled mediation for August 25, 2011

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before private mediator Carla Barboza. As such, all parties agree that the Settlement Conference

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scheduled for July 1, 2011 is unnecessary and stipulate that it be taken off calendar.

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1 Likewise, the parties anticipate taking additional discovery prior to the August 25, 2011
2 mediation in order for the mediation to be more productive, and stipulate that the current deadlines
3 be extended to accommodate adequately preparing the matter.

4 In good faith and by agreement of the parties, through counsel undersigned, it is
5 respectfully requested that a revised scheduling order be entered to reflect the following stipulated
6 deadlines:

- 7 1. The deadline for completing discovery shall be September 30, 2011;
- 8 2. The deadline for filing dispositive motions shall be September 30, 2011;
- 9 3. The expert disclosure deadline shall be October 30, 2011;
- 10 4. The expert discovery deadline shall be November 30, 2011; and
- 11 5. The trial start date be continued to January 31, 2012.

12 These deadlines shall not be amended without further Order of the Court.

13 This stipulation and the proposed order are submitted in good faith and not for the purpose
14 of delay.

15 This Stipulation may be signed in counter-parts, each counter-part having the same force
16 and effect as originals, and facsimile signatures shall be deemed to have the same force as
17 originals.

18 IT IS SO STIPULATED.

19 DATED: June 24, 2011

LEWIS BRISBOIS BISGAARD & SMITH LLP

21 By: /s/ Jeffrey S. Ranen
22 Jeffrey S. Ranen
23 Nathalie Adourian
24 Attorneys for Defendant GIUMARRA
25 VINEYARDS CORPORATION
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1 DATED: June 24, 2011

**U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION**

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By: /s/ Connie K. Liem
Connie K. Liem
Attorneys for Plaintiff U.S. Equal Employment
Opportunity Commission

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6 DATED: June 24, 2011

CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

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By: /s/ Megan Beaman
Megan Beaman
Attorney for Plaintiff-Intervenors Maribel Ochoa,
Delfina Ochoa, Jose Ochoa

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DATED: June 24, 2011

MARCOS CAMACHO, A LAW CORP.

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By: /s/ Mario Martinez
Mario Martinez
Attorney for Plaintiff-Intervenor Guadalupe
Martinez

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ORDER

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The Court has reviewed this stipulation and for good cause shown, grants the Stipulated
Order.

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23 IT IS SO ORDERED.

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Dated: June 27, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE

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