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12 Additional Counsel listed on Page Two

13 UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA

15 U.S. EQUAL EMPLOYMENT  
 16 OPPORTUNITY COMMISSION,

17 Plaintiff,

18  
 19 DELFINA OCHOA, MARIBEL OCHOA,  
 20 JOSÉ OCHOA, and GUADALUPE  
 MARTINEZ

21 Plaintiffs/Intervenors

22 vs.

23  
 24 GIUMARRA VINEYARDS CORPORATION  
 and DOES 1-10,

25 Defendants.  
 26

Case No.: **1:09-CV-02255-AWI-MJS**

**AMENDED STIPULATION AND ORDER  
 TO EXTEND DEADLINES**

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

Action filed: December 29, 2009

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2 3 Williams Road  
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4 Attorneys for Plaintiffs/Intervenors  
5 DELFINA OCHOA, MARIBEL OCHOA, and JOSÉ OCHOA  
6 **TO THE HONORABLE COURT AND TO ALL PARTIES OF AND COUNSEL**

7 **OF RECORD:**

8 The parties stipulate that the current deadlines be extended for good cause, namely the  
9 need for more time to: (1) complete outstanding discovery which has resulted from conflicts in  
10 counsel schedules; (2) resolve outstanding discovery disputes; and (3) allow for expert  
11 witnesses' thorough and complete preparation for this matter. The parties have engaged in  
12 mediation in this matter and are continuing related discussions.

13 In good faith and by agreement of the parties, through counsel undersigned, and pursuant  
14 to the Court's Minute Order of October 17, 2011, it is respectfully requested that a revised  
15 scheduling order be entered to reflect the following stipulated deadlines:

- 16 1. The deadline for completing discovery shall be December 30, 2011;
- 17 2. The deadline for filing dispositive motions shall be January 30, 2012;
- 18 3. The settlement conference shall take place on January 30, 2012; **[By order of the**

19 **Court, the settlement conference shall begin at 1:30 p.m. in courtroom 6.]**

- 20 4. The expert disclosure deadline shall be February 28, 2012;
- 21 5. The expert discovery deadline shall be March 30, 2012;
- 22 6. The pretrial conference shall take place on or after April 13, 2012;
- 23 7. The trial date shall be continued to June 11, 2012, or on a subsequent date  
24 convenient to the Court. **[By order of the Court, the trial will begin June 12, 2012 at 8:30**  
25 **a.m. in Courtroom 2.]**

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

27 This stipulation and the proposed order are submitted in good faith and not for the  
28

1 purpose of delay.

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

5 IT IS SO STIPULATED.

6  
7 DATED: November 16, 2011

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

8  
9 By: /s/ Jeffrey S. Ranen  
10 Jeffrey S. Ranen  
11 Alexander J. Harwin  
12 Attorneys for Defendant GIUMARRA  
VINEYARDS CORPORATION

13 DATED: November 1, 2011

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

14  
15  
16 By: /s/ Rumduol Vuong  
17 Rumduol Vuong  
18 Attorneys for Plaintiff U.S. Equal Employment  
Opportunity Commission

19 DATED: November 1, 2011

**CALIFORNIA RURAL LEGAL ASSISTANCE, INC.**

20  
21 By: /s/ Megan Beaman  
22 Megan Beaman  
23 Attorney for Plaintiff-Intervenors Maribel Ochoa,  
Delfina Ochoa, Jose Ochoa

1 DATED: November 1, 2011

**MARCOS CAMACHO, A LAW CORP.**

2  
3 By: /s/ Mario Martinez  
4 Mario Martinez  
5 Attorney for Plaintiff-Intervenor Guadalupe  
6 Martinez

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12 **ORDER**

13 The Court has reviewed this stipulation and for good cause shown, grants the Stipulated  
14 Order but moves the trial date to June 12, 2012 and sets the January 30, 2012, settlement  
15 conference to begin at 1:30 p.m.

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17 IT IS SO ORDERED.

18  
19 November 16, 2011

/S/ Michael J. Seng

20 United States Magistrate Judge  
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