| 1 | MEGAN BEAMAN (SBN 261539) California Rural Legal Assistance, Inc. | | | |
|----|---|--|--|--|
| 2 | 1460 6th Street | | | |
| 3 | Coachella, CA 92236 Telephone: (760) 398-7261 | | | |
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| 4 | A44 | | | |
| 5 | Attorneys for Plaintiffs/Intervenors DELFINA OCHOA, MARIBEL OCHOA, and JOSÉ OCHOA | | | |
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| 10 | Attorneys for Plaintiffs/Intervenors | | | |
| 11 | DELFINA OCHOA, MARIBEL OCHOA, JOSÉ OCHOA, and GUADALUPE MARTINEZ | | | |
| 12 | Additional Counsel listed on Page Two | | | |
| 13 | UNITED STATES DISTRICT COURT | | | |
| 14 | EASTERN DISTRICT OF CALIFORNIA | | | |
| 15 | | | | |
| 16 | U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, | Case No.: 1:09-CV-02255-AWI-MJS | | |
| 17 | | STIPULATION AND ORDER TO EXTEND DISCOVERY DISPUTE | | |
| 18 | Plaintiff, | CONFERENCE | | |
| 19 | DELFINA OCHOA, MARIBEL OCHOA, | | | |
| | JOSÉ OCHOA, and GUADALUPE | The Honorable Michael J. Seng U.S. Magistrate Judge | | |
| 20 | MARTINEZ | | | |
| 21 | Plaintiffs/Intervenors | Action filed: December 29, 2009 | | |
| 22 | VS. | | | |
| 23 | | | | |
| 24 | GIUMARRA VINEYARDS CORPORATION and DOES 1-10, | | | |
| 25 | Defendants. | | | |
| 26 | | | | |
| 27 | /// | | | |
| 28 | /// | | | |
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| | FEOC W Ciumarra Winovarde Corn | | | |

| 1 | MICHAEL MEUTER (SBN 161554) California Rural Legal Assistance, Inc. 3 Williams Road Salinas CA 93905 Telephone: (831) 757-5221 Facsimile: (831) 757-6212 | | |
|----|--|--|--|
| 3 | | | |
| 4 | Attorneys for Plaintiffs/Intervenors | | |
| 5 | DELFINA OCHOA, MARIBEL OCHOA, and JOSÉ OCHOA | | |
| 6 | | | |
| 7 | TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL OF | | |
| 8 | RECORD: | | |
| 9 | Based on a pre-existing scheduling conflict for Plaintiff-Intervenor's counsel, the parties | | |
| 10 | stipulate that the discovery dispute conference currently scheduled for December 7, 2011 at 4:00 | | |
| 11 | p.m. be continued to December 14, 2011 at 4:00 p.m. In addition, the parties stipulate that | | |
| 12 | Plaintiff-Intervenors will provide the Court and all parties with their position statement regarding | | |
| 13 | the dispute on or before December 7, 2011. Defendant will produce its statement regarding the | | |
| 15 | dispute to the Court and all parties on or before December 12, 2011. | | |
| 16 | This stipulation and the proposed order are submitted in good faith and not for the | | |
| 17 | purpose of delay. | | |
| 18 | This Stipulation may be signed in counter-parts, each counter-part having the same force | | |
| 19 | and effect as originals, and electronic signatures shall be deemed to have the same force as | | |
| 20 | originals. | | |
| 21 | IT IS SO STIPULATED. | | |
| 22 | | | |
| 23 | DATED: November 28, 2011 LEWIS BRISBOIS BISGAARD & SMITH LLP | | |
| 24 | | | |
| 25 | By: /s/ Jeffrey S. Ranen | | |
| 26 | Jeffrey S. Ranen Alexander Harwin | | |
| 27 | Attorneys for Defendant GIUMARRA VINEYARDS CORPORATION | | |

28

| 1 | DATED: November 28, 2011 | | EQUAL EMPLOYMENT OPPORTUNITY MISSION |
|----|--|---------|--|
| 2 | | | |
| 3 | | By: | /s/ Rumduol Vuong |
| 4 | | • | Rumduol Vuong |
| 5 | | | Attorneys for Plaintiff U.S. Equal Employment Opportunity Commission |
| 6 | DATED: November 28, 2011 | | |
| 7 | | CALI | FORNIA RURAL LEGAL ASSISTANCE, INC. |
| 8 | | | |
| 9 | | By: | /s/ Megan Beaman Megan Beaman |
| 10 | | | Attorney for Plaintiff-Intervenors Maribel Ochoa, Delfina Ochoa, Jose Ochoa |
| 11 | | | |
| 12 | DATED: November 28, 2011 | MAR | COS CAMACHO, A LAW CORP. |
| 13 | | | |
| 14 | | By: | /s/ Mario Martinez |
| 15 | | · | Mario Martinez Attorney for all Plaintiff-Intervenors |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | | | ORDER |
| 20 | The Court has reviewed this stipulation and for good cause shown, grants the Stipulate | | on and for good cause shown, grants the Stipulated |
| 21 | Order. | supului | on and for good easile shown, grains the superaced |
| 22 | Older. | | |
| 23 | | | |
| 24 | | | |
| 25 | IT IS SO ORDERED. | | |
| 26 | | | $M \sim \alpha G C O$ |
| 27 | Dated: November 28, 20 | 011_ | <u> 181 Michael J. Seng</u> |
| 28 | | | UNITED STATES MAGISTRATE JUDGE |