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7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF CALIFORNIA**
9

10 U.S. EQUAL EMPLOYMENT) Case No.: 1:11-CV-01658 LJO DLB
OPPORTUNITY COMMISSION,)
11 Plaintiff,) **STIPULATION TO EXTEND**
12 v.) **DISCOVERY DEADLINES**
13 HOSPITAL HOUSEKEEPING SYSTEMS,)
14 INC., HOSPITAL HOUSEKEEPING)
15 SYSTEMS, LLC, AND DOES 1-10,)
16 INCLUSIVE,)
17 Defendant(s).)

18 Plaintiff United States Equal Employment Opportunity Commission (“EEOC” or
19 “Plaintiff”) and Defendants Hospital Housekeeper Systems, Inc., Hospital Housekeeping
20 Systems LLC (“Defendants”), through their respective counsel of record, hereby stipulate
21 pursuant to Rules 16 and 26 of the Federal Rules of Civil Procedure as follows:

22 **1. Good Cause to Extend Discovery Deadlines**

23 All parties and counsel for all parties have engaged in good faith efforts to further
24 discovery in this case, including exchanging initial disclosures and engaging in written discovery
25 consisting of interrogatories, request for production of documents, and requests for admission.
26 However, there have been reasonable delays in providing responses to the written requests and
27 the scheduling of deposition of witnesses has been problematic as some witnesses have left
28 Defendants’ employment and other witnesses are currently outside the jurisdiction of this court.

1 Counsel for all parties have worked cooperatively in providing extensions to deadlines for the
2 purpose of adequately addressing the nature and scope of written discovery and to secure witness
3 testimony. However, due to other cases and commitments, it has proven difficult to hold the
4 necessary depositions and conduct necessary discovery prior to the end of the discovery deadline
5 contained in the original scheduling order.

6 The parties have also engaged in preliminary discussions regarding a settlement and
7 agree that given additional time to conduct the necessary discovery the parties should be in a
8 position to hold meaningful settlement discussions.

9 **2. Stipulation to Extend Discovery Deadlines**

10 The parties stipulate that the original Joint Scheduling Order be amended to reflect the
11 following new deadlines:

12 a. All discovery shall be completed before March 1, 2013.
13 b. The parties are directed to disclose all expert witnesses, in writing, on or
14 before March 21, 2013 and to disclose all supplemental experts on or before
15 April 21, 2013.

16 IT IS SO STIPULATED.

17 U.S. EQUAL EMPLOYMENT
18 OPPORTUNITY COMMISSION

19 Date: November 1, 2012

20 By: /s/ Rumie Vuong
Rumie Vuong
Attorney for Plaintiff U.S. EEOC

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23 FULLBRIGHT JAWORSKI LLP

24 Date: November 1, 2012

25 By: /s/ Julie Capell
Marcus Torrano
Julie Capell
Attorney for Defendants Hospital
Housekeeping Inc and Hospital
Housekeeping LLC

ORDER

FOR GOOD CAUSE SHOWN, this Stipulation to extend Discovery deadlines is hereby approved and the new deadlines for discovery as set forth in Section III of the Joint Scheduling Order shall be amended as follows:

The parties are ordered to complete all discovery on or before March 1, 2013.

The parties are directed to disclose all expert witnesses, in writing, on or before March 21, 2013 and to disclose all supplemental experts on or before April 21, 2013. The written designation of retained and non retained experts shall be made pursuant to Fed. R.Civ.P. Rule 26(a)(2), (A) and (B) and shall include all information required thereunder.

All other provisions of Part III of the Joint Scheduling Conference Order shall otherwise remain in effect.

IT IS SO ORDERED.

Dated: November 1, 2012

/s/ Dennis L. Beck

UNITED STATES MAGISTRATE JUDGE