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

10 U.S. EQUAL EMPLOYMENT  
11 OPPORTUNITY COMMISSION,

12 Plaintiff,

13 v.

14 HOSPITAL HOUSEKEEPING SYSTEMS,  
15 INC., HOSPITAL HOUSEKEEPING  
16 SYSTEMS, LLC, AND DOES 1-10,  
17 INCLUSIVE,

Defendant(s).

) Case No.: 1:11-CV-01658 LJO DLB

) **STIPULATION TO EXTEND**  
) **DISCOVERY DEADLINES**

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  
21 Rumie Vuong  
22 Attorney for Plaintiff U.S. EEOC

23 FULLBRIGHT JAWORSKI LLP

24 Date: November 1, 2012

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

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

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

Dated: November 1, 2012

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