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1. The current upcoming trial and discovery deadlines are as follows: (a) **deadline for dispositive motions to be filed – February 11, 2013**, (b) **non-expert discovery cutoff date – March 1, 2013**, (c) expert designation and report deadline – March 21, 2013, (d) **deadline for dispositive motions to be heard – March 28, 2013**, (d) rebuttal expert witness designation and report deadline – April 21, 2013, (e) pretrial conference – May 21, 2013, and (f) trial – July 9, 2013.
2. The parties have dutifully engaged in factual discovery during the pendency of this litigation, including exchanging initial disclosures, preparing and responding to three sets of written discovery requests, and taking the principal factual witness depositions. The last deposition was taken on January 10, 2013 in Los Angeles by Plaintiff's counsel. The deponent, William Crowell, was the manager who terminated Charging Party Angelica Jaime-Cece. Mr. Crowell agreed to travel to Los Angeles from Mississippi, where he currently resides, for his deposition. Due to work constraints, Mr. Crowell's pre-paid vacation in November 2012, and the availability of counsel, his deposition was not able to be scheduled until January 10, 2013.
3. Since Mr. Crowell's deposition, which signaled the end of principal factual discovery in this case, counsel for the parties have been engaged in active settlement discussions and last met on Monday, February 4, 2013 in Los Angeles to discuss settlement.

- 1       4. Counsel for the parties made great headway during the settlement meeting and agree that  
2       there is a good chance the case will settle. However, the parties anticipate that it will take  
3       at least two weeks to confirm and evaluate whether an agreement may be reached on the  
4       monetary and injunctive relief.
- 5       5. In the meantime, if the parties are unable to settle the case, Defendants plan to file a  
6       motion for summary judgment and the deadline by which they must file their motion for  
7       summary judgment is Monday, February 11, 2013.
- 8       6. Because the parties are close to settling this case, and because Defendants' ability to  
9       settle the case will be hampered if they are forced to spend money preparing and filing a  
10      motion for summary judgment – money that could be applied towards settlement - the  
11      parties respectfully request that the deadline to file dispositive motions be extended to  
12      March 11, 2013, and the deadline by which dispositive motions shall be heard be  
13      extended to April 25, 2013. These dates will not interfere with the Court's pretrial  
14      conference date (May 21, 2013) or the trial date (July 9, 2013).
- 15     7. The parties further request that the non-expert discovery cutoff be extended by 28 days to  
16     March 28, 2013 so that the parties can concentrate on settlement discussions, and avoid  
17     the expense of completing the last round of written discovery and two remaining factual  
18     depositions if a settlement can be reached.
- 19     8. The parties have only submitted one previous request to extend the deadlines in this case  
20     and the request related to non-expert discovery and the expert designation deadlines. The  
21     request did not request extending the dispositive motion deadline.
- 22     9. Counsel for the parties are willing to engage in a telephone conference with the Court  
23     should further information be required or requested.

24       **WHEREFORE**, Plaintiff and Defendants request a continuance of the non-expert  
25     discovery cutoff date to March 28, 2013, a continuance of the deadline to file dispositive motions  
26     to March 11, 2013, and a continuance of the deadline by which dispositive motions shall be  
27     heard to April 25, 2013.

1 IT IS SO STIPULATED.

2 U.S. EQUAL EMPLOYMENT OPPORTUNITY  
3 COMMISSION

4 Date: February 6, 2013

5 By: /s/ Rumie Vuong  
6 Rumie Vuong  
7 Attorney for Plaintiff U.S. EQUAL  
8 EMPLOYMENT OPPORTUNITY  
9 COMMISSION

10 FULBRIGHT & JAWORSKI L.L.P.

11 Date: February 6, 2013

12 By: /s/ Julie Capell  
13 Julie M. Capell  
14 Attorney for Defendant Hospital Housekeeping  
15 Systems Ltd., Hospital Housekeeping Systems of  
16 Houston, Inc., Hospital Housekeeping Systems Inc.,  
17 and Hospital Housekeeping Systems, LLC  
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The parties are ordered to complete all non-expert discovery on or before March 25, 2013.

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

Dated: **February 7, 2013**

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