

1 Anna Y. Park, CA SBN 164242  
2 Rumduol Vuong, CA SBN 264392  
3 U.S. EQUAL EMPLOYMENT  
4 OPPORTUNITY COMMISSION  
5 255 East Temple Street, Fourth Floor  
6 Los Angeles, CA 90012  
7 Telephone: (213) 894-1083  
8 Facsimile: (213) 894-1301  
9 E-Mail: [lado.legal@eeoc.gov](mailto:lado.legal@eeoc.gov)

10 Attorney for Plaintiff  
11 U.S. EQUAL EMPLOYMENT  
12 OPPORTUNITY COMMISSION  
13

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 U.S. EQUAL EMPLOYMENT ) Case No.: 1:11-CV-1658 LJO SAB  
17 OPPORTUNITY COMMISSION, )  
18 Plaintiff, ) **STIPULATION TO EXTEND  
19 vs. ) DISCOVERY AND DISPOSITIVE  
20 ) MOTION DEADLINES**  
21 HOSPITAL HOUSEKEEPING SYSTEMS, )  
22 LTD., HOSPITAL HOUSEKEEPING )  
23 SYSTEMS OF HOUSTON, INC, )  
24 HOSPITAL HOUSEKEEPING SYSTEMS, )  
25 INC., HOSPITAL HOUSEKEEPING )  
26 SYSTEMS, LLC, AND DOES 1-10, )  
27 INCLUSIVE, )  
28 Defendant(s). )

29 **A. Good Cause to Extend Discovery and Motion Deadlines**

30 Plaintiff United States Equal Employment Opportunity Commission (“EEOC” or  
31 “Plaintiff”) and Defendants Hospital Housekeeping Systems Inc. and Hospital Housekeeping  
32 Systems, LLC (“Defendants”), through their respective counsel of record herein, hereby  
33 respectfully request continuances of the non-expert and expert discovery cutoff dates, expert  
34 disclosure deadlines, deadlines to oppose and reply to the dispositive motions, and the pretrial  
35 conference date.

1       The parties have dutifully engaged in factual discovery during this litigation, including  
2 exchanging initial disclosures, preparing and responding to several sets of written discovery  
3 requests, and taking witness depositions. Both parties have several depositions and discovery  
4 requests pending. Non-expert discovery is due to be completed on March 25, 2013. Counsel for  
5 both parties engaged in active settlement discussions, including several conference calls and an  
6 in person meeting. The parties are of the good faith belief that a settlement conference in front  
7 of a magistrate judge will resolve the outstanding issues preventing a successful settlement. The  
8 parties have conferred with the court and agreed to a settlement conference on March 28, 2013 at  
9 9:30AM in front of Magistrate Judge Barbara A. McAuliffe.

10       Defendants have filed a motion for summary judgment, whose opposition is currently due  
11 on March 28, 2013 with Defendants' reply due on April 4, 2013. The parties thereby request an  
12 extension of the current litigation deadlines to focus on settling this case with the court's  
13 assistance.

14       **B. Stipulation to Extend Deadlines**

15       The parties stipulate that the Scheduling Order be amended to reflect the following new  
16 deadlines:

- 17       1. The parties shall attend a settlement conference before Judge Barbara A. McAuliffe  
18           on March 28, 2013 at 9:30AM. Confidential settlement conference briefs shall be  
19           sent to Judge McAuliffe's chambers on or before March 21, 2013.
- 20       2. All non expert discovery shall be completed on or before April 18, 2013.
- 21       3. Plaintiff's opposition to Defendants' motion for summary judgment shall be filed on  
22           or before April 18, 2013. Defendants' reply to Plaintiff's opposition shall be filed on  
23           or before April 25, 2013. Unless the Court orders otherwise, there shall be no hearing  
24           set for the motion for summary judgment, and a ruling will be made on the papers.
- 25       4. Expert designations shall be made on or before April 22, 2013 and rebuttal expert  
26           designations shall be made on or before May 6, 2013.
- 27       5. All expert discovery shall be completed on or before May 22, 2013.

6. The pre-trial conference shall be held on June 5, 2013 at 8:30AM. The joint pre-trial conference statement shall be due on or before May 29, 2013.

IT IS SO STIPULATED.

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Date: March 13, 2013

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

## FULLBRIGHT & JAWORSKI LLP

Date: March 13, 2013

By: /s/ Julie Capell  
Julie M. Capell  
Attorney for Defendants Hospital Housekeeping  
Systems Inc. and Hospital Housekeeping Systems,  
LLC

## ORDER

For good cause shown, the stipulation to extend discovery deadlines is hereby approved and the new deadlines for discovery as set forth in the Scheduling Order shall be amended as follows:

1. The parties shall attend a settlement conference before Judge Barbara A. McAuliffe on March 28, 2013 at 9:30AM. Confidential settlement conference briefs shall be sent to Judge McAuliffe's chambers on or before March 21, 2013.
2. All non expert discovery shall be completed on or before April 18, 2013.
3. Plaintiff's opposition to Defendants' motion for summary judgment shall be filed on or before April 18, 2013. Defendants' reply to Plaintiff's opposition shall be filed on or before April 25, 2013. Unless the Court orders otherwise, there shall be no hearing set for the motion for summary judgment, and a ruling will be made on the papers.
4. Expert designations shall be made on or before April 22, 2013 and rebuttal expert designations shall be made on or before May 6, 2013.
5. All expert discovery shall be completed on or before May 22, 2013.
6. The pre-trial conference shall be held on June 5, 2013 at 8:30AM. The joint pre-trial conference statement shall be due on or before May 29, 2013.

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

IT IS SO ORDERED.

Dated: **March 13, 2013**

/s/ Lawrence J. O'Neill  
UNITED STATES DISTRICT JUDGE