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13 **UNITED STATES DISTRICT COURT**
14 **EATERN DISTRICT OF CALIFORNIA**

15 U.S. EQUAL EMPLOYMENT
16 OPPORTUNITY COMMISSION,

17 Plaintiff,

18 vs.

19 HOSPITAL HOUSKEEPING SYSTEMS,
20 LTD., HOSPITAL HOUSEKEEPING
21 SYSTEMS OF HOUSTON, INC,
22 HOSPITAL HOUSEKEEPING SYSTEMS,
23 INC., HOSPITAL HOUSKEEPING
24 SYSTEMS, LLC, AND DOES 1-10,
25 INCLUSIVE,

26 Defendant(s).

) Case No.: 1:11-CV-1658 LJO BAM

) **STIPULATION TO EXTEND DEADLINE**
) **TO SUBMIT CONSENT DECREE**

27 Plaintiff United States Equal Employment Opportunity Commission (“EEOC” or
28 “Plaintiff”) and Defendants Hospital Housekeeping Systems Inc. and Hospital Housekeeping
Systems, LLC (“Defendants”), through their respective counsel of record herein, hereby
respectfully request a one week continuance of the deadline to submit a proposed consent decree.

On November 21, 2013, the Court adopted the Magistrate Judge’s Findings and
Recommendations and granted Defendants’ motion to enforce. The Court ordered that the
parties meet and confer and submit a proposed consent decree or a letter addressing the disputed
terms on or before December 2, 2013.

1 The parties have attempted to engage meaningfully in the meet and confer process and
2 consult with their respective clients. However, such efforts have been hampered by the
3 Thanksgiving holiday and the unavailability of counsel for other reasons. For instance,
4 plaintiff's counsel was on two weeks leave (November 18, 2013 to November 29, 2013) to care
5 for a family member and defense counsel is unavailable for most of today.

6 The parties thereby request an extension of the current deadline to submit the consent
7 decree by one week. An extension would permit the parties to resolve several, if not all, of the
8 remaining issues, thereby either decreasing the number of issues the parties will need to submit
9 to the Court or resolution or permitting the parties to submit a final consent decree.

10 **Stipulation to Extend Deadlines**

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

- 13 1. The parties shall submit an agreed proposed consent decree or their letter briefing
14 addressing the disputed terms of the consent decree on or before 12/9/2013.

15 IT IS SO STIPULATED.

17 U.S. EQUAL EMPLOYMENT OPPORTUNITY
18 COMMISSION

19 Date: December 3, 2013

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

23 FULLBRIGHT & JAWORSKI LLP

24 Date: December 3, 2013

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

1 **ORDER**

2 For good cause shown, the stipulation to extend discovery deadlines is hereby approved
3 and the parties shall submit an agreed proposed consent decree or their letter briefing addressing
4 the disputed terms of the consent decree on or before December 9, 2013.

5
6 IT IS SO ORDERED.

7
8 Dated: **December 3, 2013**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE