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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

v.

FARMERS INSURANCE EXCHANGE,  
AND DOES 1-10, INCLUSIVE,

Defendant(s).

) Case No.: 1:13-cv-01574 AWI SKO  
)

) **JOINT STIPULATION TO EXTEND  
DISCOVERY AND TRIAL DEADLINES;  
ORDER THEREON**  
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Plaintiff United States Equal Employment Opportunity Commission (“EEOC” or “Plaintiff”) and Defendants Farmers Insurance Exchange (“Farmers” or “Defendant”), through their respective counsel of record, hereby stipulate pursuant to Rules 16 and 26 of the Federal Rules of Civil Procedure as follows:

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

The parties come before the court to seek a second extension of the discovery and trial deadlines. The parties anticipate that this will be the final request for extension of these deadlines. The parties have engaged in good faith efforts to further discovery in this matter and to resolve discovery dispute.

1 The current extension will extend necessary time for the parties to pursue settlement  
2 discussions. While no settlement has been reached, the parties have made progress on this  
3 matter, including during the April 23, 2015 Settlement Conference, and are attempting to  
4 schedule an in person meeting and/or mediation in June 2015. The extension will permit both  
5 sides to focus on these settlement discussions without diverting resources and attention to  
6 litigation matters.

7 An extension is also required as Plaintiff's counsel will be unavailable for most of August  
8 2015 to care for a relative. Due to the above reasons as well as other cases and commitments, it  
9 has proven difficult to complete the necessary depositions and written discovery prior to the  
10 discovery deadline contained in the original scheduling order. As such, the Parties request that  
11 the Court for good cause grant the Parties' second request for an extension of time.

12 **2. Stipulation to Conduct Settlement Conference**

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

- 15 a. Non expert discovery shall be completed by January 8, 2016;
- 16 b. Expert disclosure shall be completed by January 29, 2016;
- 17 c. Supplemental expert disclosure shall be completed by February 26, 2016;
- 18 d. Expert discovery shall be completed by March 18, 2016;
- 19 e. Non dispositive motions shall be submitted by April 1, 2016;
- 20 f. Dispositive motion shall be submitted by April 22, 2016;
- 21 g. Pretrial conference shall be held on July 19, 2016;
- 22 h. Trial shall begin August 30, 2016.

23 IT IS SO STIPULATED.

24 U.S. EQUAL EMPLOYMENT  
25 OPPORTUNITY COMMISSION

26 Date: June 2, 2015

By:

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

28 SEYFARTH SHAW

1 Date: June 2, 2015

2 By: /s/ Laura Maechtlen  
3 Laura Maechtlen  
4 Attorney for Defendant Farmers Insurance  
5 Exchange

6 **ORDER**

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

- 10 a. Non expert discovery shall be completed by January 8, 2016;  
11 b. Expert disclosure shall be completed by January 29, 2016;  
12 c. Supplemental expert disclosure shall be completed by February 26,  
13 2016;  
14 d. Expert discovery shall be completed by March 18, 2016;  
15 e. Non dispositive motions shall be filed by April 1, 2016;  
16 f. Non dispositive motions shall be heard no later than May 4, 2016;  
17 g. Dispositive motions shall be filed by April 22, 2016;  
18 h. Dispositive motions shall be heard no later than June 6, 2016;  
19 i. Pretrial conference shall be held on July 20, 2016;<sup>1</sup> and  
20 j. Trial shall begin August 30, 2016.

21 IT IS SO ORDERED.

22 Dated: June 2, 2015

23 /s/ Sheila K. Oberto  
24 UNITED STATES MAGISTRATE JUDGE

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28 <sup>1</sup> The parties requested the pretrial conference be held on July 19, 2015, but this has been adjusted to comport with the district court's calendar.