1	Anna Y. Park, CA SBN 164242
	Sue Noh, CA SBN 192134 Rumduol Vuong, CA SBN 264392
2	Jennifer L. Boulton, CA SBN 259076
3	Lorena Garcia Bautista, CA SBN 234091
4	Eric Yau, CA SBN 275457
	U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
5	255 East Temple Street, Fourth Floor
6	Los Angeles, CA 90012
	Telephone: (213) 894-1083
7	Facsimile: (213) 894-1301 Email: lado.legal@eeoc.gov
8	
9	Juan Carlos Jauregui, SBN 280492
	U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
10	2300 Tulare Street, Suite 215
11	Fresno, CA 93721
12	Telephone: (559)487-5135
	Facsimile: (559) 487-5053 E-Mail: juancarlos.jauregui@eeoc.gov
13	Attorneys for Plaintiff
14	U.S. EQUAL EMPLOYMENT
15	OPPORTUNITY COMMISSION
	LITTLER MENDELSON, P.C.
16	Kevin V. Koligian, Bar No. 258711
17	Natalie M. Jansen, Bar No. 286401
18	5200 North Palm Avenue, Suite 302 Fresno, CA 93704-2225
	Telephone: 559.244.7500
19	Facsimile: 559.244.7525
20	E-mail:kkoligian@littler.com njansen@littler.com
21	injansen@ittier.com
	MICHAEL BEST & FRIEDRICH LLP
22	Amy Schmidt Jones (admitted <i>pro hac vice</i> ) Anne M. Carroll (admitted <i>pro hac vice</i> )
23	100 East Wisconsin Avenue, Suite 3300
24	Milwaukee, WI 53202-4108
27	Telephone: 414.271.6560
25	Facsimile: 414.277.0656 E-mail: asjones@michaelbest.com
26	amcarroll@michaelbest.com
27	
28	

1 2 3 4 5 6 7 8		DISTRICT COURT CT OF CALIFORNIA
9	U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,	Case No. 1:15- CV-01431-DAD-BAM
10	Plaintiff,	JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND PRELIMINARY
11 12	v.	SCHEDULING ORDER DEADLINE
12	SENSIENT DEHYRDRATED FLAVORS COMPANY, et al., Does 1 - 10 inclusive,	
14	Defendants.	
15		
16		
17		
18		
19		
20		
21		
22		
23 24		
24		
26		
27		
28		

Plaintiff United States Equal Employment Opportunity Commission ("EEOC" or
"Plaintiff") and Defendant Sensient Natural Ingredients LLC (incorrectly identified in the
Complaint as "Sensient Natural Ingredients, LLC") ("SNI"), f/k/a Sensient Dehydrated Flavors
LLC (incorrectly identified in the Complaint as "Sensient Dehydrated Flavors, LLC"), and
successor in interest to Sensient Dehydrated Flavors Company ("Defendant"), through their
respective counsel of record, hereby stipulate pursuant to Rule 16 of the Federal Rules of Civil
Procedure as follows:

8

## 1. Good Cause to Extend Preliminary Scheduling Order Deadline

The parties come before the Court to seek an extension of the Preliminary Scheduling 9 Order deadline to amend the parties' pleadings by stipulation solely as to the naming of the 10 proper Defendant. Specifically, the parties seek an extension to reach an agreement as to the 11 naming of SNI as the sole Defendant. While the parties have not yet agreed to a stipulation, the 12 parties have met and conferred and documents have been provided outside of the formal 13 discovery process. The parties currently are working on the terms of the stipulation. The EEOC 14 has requested additional time to negotiate a stipulation, and SNI does not oppose a four-week 15 extension (i.e. 28 days) to permit the parties to reach an agreement with respect to the naming of 16 SNI as the sole Defendant and to amend the Complaint accordingly. As such, the parties request 17 that the Court, for good cause, grant the parties' request for an extension of time for the sole 18 purpose of filing a stipulated amendment to the Complaint to name SNI as the sole corporate 19 Defendant.

20

21

22

23

24

25

26

///

| | |

///

## 2. Stipulation to Amend Preliminary Scheduling Order

The parties stipulate that the Preliminary Scheduling Order be amended to reflect the following new deadline:

28

27

1	1. All stipulated amendments or motions to amend the Complaint to name SNI as the				
2	sole corporate Defendant shall be filed by September 2, 2016. The August 5, 2016				
3	deadline for amending or filing a stipulated amendment to the pleadings remains in				
4	effect for all other				
5	IT IS SO STIPULATE	ED.			
6			U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION		
7	Date: August 8, 2016	By:	/s/ Jennifer L. Boulton Jennifer L. Boulton		
8			Jennifer L. Boulton Attorney for Plaintiff U.S. EEOC		
9			MICHAEL BEST & FRIEDRICH LLP		
10	Date: August 8, 2016	Dave			
11	Date. August 8, 2010	By:	<u>/s/ Amy Schmidt Jones</u> Amy Schmidt Jones		
12			Attorney for Defendant Sensient Natural Ingredients LLC		
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
	11				

1	OPDED
$\frac{1}{2}$	ORDER
3	For good cause shown, the stipulation to extend the Preliminary Scheduling Order
4	deadline is hereby approved and the new deadline for amendment to the parties' pleadings as set
5	forth in the Preliminary Scheduling Order shall be amended as follows:
6	1. All stipulated amendments or motions to amend the Complaint to name SNI as the
7	sole corporate Defendant shall be filed by September 2, 2016. The August 5, 2016
8	deadline for amending or filing a stipulated amendment to the pleadings remains in
9	effect for all other purposes.
10	
11	IT IS SO ORDERED.
12	
13	Dated: August 8, 2016 /s/ Barbara A. McAuliffe
14	UNITED STATES MAGISTRATE JUDGE
15	
16	
17	
18	
19 20	
20	
21	
22 23	
23 24	
24	
26	
27	
28	