

1 Anna Y. Park (SB# 164242)  
Sue J. Noh (SB# 192134)  
2 Nakkisa Akhavan (SB# 286260)  
U.S. EQUAL EMPLOYMENT  
3 OPPORTUNITY COMMISSION  
255 East Temple Street, Fourth Floor  
4 Los Angeles, CA 90012  
Telephone: (213) 894-1083  
5 Facsimile: (213) 894-1301  
E-Mail: lado.legal@eeoc.gov  
6 Attorneys for Plaintiff  
U.S. EQUAL EMPLOYMENT  
7 OPPORTUNITY COMMISSION

8 JAN E. EAKINS (SB# 100612)  
janeakins@paulhastings.com  
9 PAUL HASTINGS LLP  
515 South Flower Street  
10 Twenty-Fifth Floor  
Los Angeles, California 90071-2228  
11 Telephone: (213) 683-6000  
Facsimile: (213) 627-0705

12 Attorneys for Defendant  
13 PACIFIC BELL TELEPHONE COMPANY  
(Erroneously Named as AT&T Pacific Bell Telephone  
14 Company)

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 U.S. EQUAL OPPORTUNITY  
18 EMPLOYMENT COMMISSION,

19 Plaintiff,

20 vs.

21 AT&T PACIFIC BELL TELEPHONE  
COMPANY, and DOES 1-10, inclusive,

22 Defendants.  
23  
24  
25  
26  
27  
28

CASE NO. 1:17-CV-01059-LJO-EPG

**JOINT STATUS CONFERENCE  
STATEMENT AND STIPULATION TO  
CONTINUE MID-DISCOVERY  
STATUS CONFERENCE; ORDER  
THEREON**

Mid-Discovery Status Conference

Date: May 24, 2018  
Time: 9:30 a.m.  
Ctmm: 10 (6th Floor)  
Judge: Hon. Erica P. Grosjean  
U.S. Magistrate Judge

1 Plaintiff United States Equal Employment Opportunity Commission (“Plaintiff” or  
2 “Commission”) and Defendant Pacific Bell Telephone Company (“Defendant”) (collectively, the  
3 “Parties”), by and through their respective counsel of record, hereby submit this Joint Status  
4 Conference Statement to notify the Court that the Parties have been diligently engaged in  
5 extensive settlement discussions to resolve this matter and are extremely close to reaching a final  
6 agreement, subject to appropriate internal approvals by the Parties and the submission of a  
7 Proposed Consent Decree for approval by the Court.

8 Accordingly, the Parties stipulate and request that the Mid-Discovery Status Conference  
9 currently scheduled for May 24, 2018, be continued for at least thirty (30) days. The Parties  
10 currently believe that they will be able to finalize and file their Proposed Consent Decree with the  
11 Court on or about Monday, June 25, 2018. The Parties submit that there is good cause for this  
12 continuance because, among other reasons, the Parties have agreed to extensive injunctive relief  
13 that must be included in the Proposed Consent Decree, which requires time to obtain multiple  
14 levels of approval required by both Parties. Good cause also exists in order to avoid unnecessary  
15 expenditure of Court resources to conduct the Status Conference where this case is in the final  
16 stage of settlement negotiations.

17  
18 DATED: May 16, 2018

ANNA Y. PARK  
SUE J. NOH  
NAKKISA AKHAVAN  
U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

19  
20  
21  
22 By: \_\_\_\_\_ s/ Sue J. Noh  
SUE J. NOH  
23 Attorneys for Plaintiff  
24 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
25  
26  
27  
28



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

In accordance with the Parties' Stipulation and for good cause shown, the Mid-Discovery Status Conference previously scheduled for May 24, 2018, is hereby continued and will now be held on July 10, 2018, at 10:30 AM. The Court grants telephonic appearances, with each party directed to use the following dial-in number and passcode: 1-888-251-2909; passcode 1024453. The parties are also reminded to file a joint status report one full week prior to the conference and email a copy of same, in Word format, to [epgorders@caed.uscourts.gov](mailto:epgorders@caed.uscourts.gov), for the Judge's review. When the Parties file their Proposed Consent Decree, all pending Court dates will be vacated.

IT IS SO ORDERED.

Dated: May 16, 2018

/s/ Eric P. Gray  
UNITED STATES MAGISTRATE JUDGE