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16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**

18 U.S. EQUAL EMPLOYMENT
19 OPPORTUNITY COMMISSION,

20 Plaintiff,

21 vs.

22 PAPE MATERIAL HANDLING, INC., and
23 DOES 1-10, inclusive,

24 Defendants.

Case No.: 1:17-cv-01291-AWI-BAM

**JOINT STIPULATION TO EXTEND THE
DEADLINE FOR THE PARTIES TO FILE
THE PROPOSED CONSENT DECREE;
AND ORDER**

25 **TO THE HONORABLE DISTRICT COURT JUDGE, MAGISTRATE JUDGE,**
26 **DEFENDANT, AND ALL ATTORNEYS OF RECORD:**

27 Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY
28 COMMISSION (“Plaintiff”) and Defendant Pape Material Handling, Inc. (hereinafter
“Defendant”), through their respective counsel of record, hereby submits this Joint Stipulation
for the Court to extend the deadline for the Parties to file the Proposed Consent Decree from

1 April 7, 2019 to April 19, 2019.

2 As previously stated, the Plaintiff and Defendant (hereinafter collectively “Parties”)
3 were able to reach a settlement on September 20, 2018, and have agreed in principle to the
4 monetary amount and major terms of the injunctive remedies. (ECF No. 38) Per the Parties’
5 request, the Court ordered the Parties to file the Proposed Consent Decree no later than April 7,
6 2019. (ECF No. 51).

7 During this time, the Parties have diligently worked towards finalizing the many details
8 of the Proposed Consent Decree, which have included exchanging drafts of the Proposed
9 Consent Decree and its exhibit. While the Parties have made significant progress, the Parties
10 need a two-week extension to finalize the Proposed Consent Decree and obtain signatures.

11 As such, good cause exists to extend the deadline to file the Proposed Consent Decree,
12 as such action would minimize costs and conserve judicial resources to concentrate on finalizing
13 the Proposed Consent Decree. Furthermore, the requested continuance will not result in any
14 undue delay or prejudice to either party.

15 Accordingly, the Parties request that this Court extend the April 7, 2019 deadline for the
16 Parties to file the Proposed Consent Decree to April 19, 2019.

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18 Respectfully submitted,

19 Dated: April 3, 2019

/s/ Lorena Garcia-Bautista
Lorena Garcia-Bautista
Attorney for Plaintiff U.S. EEOC
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

22
23 Dated: April 3, 2019

/s/ Ryan L. Eddings
Ryan L. Eddings
Attorney for Defendant
Pape Material Handling, Inc.

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26 I, Lorena Garcia-Bautista, certify that the content of this document is acceptable to all
27 persons required to sign the document as I obtained authorization for the electronic signatures of
28 all parties on the document.

1 **ORDER**

2 Pursuant to the parties' stipulation, and for good cause showing, IT IS HEREBY ORDERED
3 that the deadline to file the Proposed Consent Decree and other settlement documents shall be
4 extended to April 19, 2019.
5 IT IS SO ORDERED.

6 Dated: April 4, 2019

7 /s/ Barbara A. McAuliffe
8 UNITED STATES MAGISTRATE JUDGE
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