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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 U.S. EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 PAPE MATERIAL HANDLING,
INC.,

16 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**

Complaint Filed: September 27, 2017

18 TO THE HONORABLE DISTRICT COURT JUDGE, MAGISTRATE
19 JUDGE, PLAINTIFF, AND ALL ATTORNEYS OF RECORD:

20 Plaintiff United States Equal Employment Opportunity Commission
21 (“Plaintiff”) and Defendant Pape Material Handling, Inc. (“Defendant”), through their
22 respective counsel of record, hereby submits this Joint Stipulation for the Court to
23 extend the deadline for the Parties to file the Proposed Consent Decree from April 19,
24 2019 to May 2, 2019.

25 As previously stated, the Plaintiff and Defendant (hereinafter collectively
26 “Parties”) were able to reach a settlement on September 20, 2018, and have agreed in
27 principle to the monetary amount and major terms of the injunctive remedies. (ECF
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1 No. 38) Per the Parties' request, the Court ordered the Parties to file the Proposed
2 Consent Decree no later than April 19, 2019. (ECF No. 53).

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

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

12 Accordingly, the Parties request that this Court extend the April 19,
13 2019 deadline for the Parties to file the Proposed Consent Decree to May 2, 2019.

14 Dated: April 18, 2018

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

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17 By: /s/ Lorena Garcia-Bautista
LORENA GARCIA-BAUTISTA
Attorneys for Plaintiff U.S. EEOC

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19 Dated: April 18, 2018

LITTLER MENDELSON, P.C.

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21 By: /s/ Ryan L. Eddings
RYAN L. EDDINGS
Attorneys for Defendant
PAPE MATERIAL HANDLING,
INC.

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25 I, Ryan L. Eddings, certify that the content of this document is acceptable
26 to all persons required to sign the document as I obtained authorization for the
27 electronic signatures of all parties on the document.
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ORDER

Pursuant to the parties’ stipulation, and good cause appearing, IT IS HEREBY ORDERED that the deadline to file the Proposed Consent Decree and other settlement documents is extended to May 2, 2019. If a further continuance is requested, the Court may set a status conference to assist the parties work through their difficulties.

IT IS SO ORDERED.

Dated: April 19, 2019

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE