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PAPE MATERIAL HANDLING, INC.

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

11 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

12 Plaintiff,

13 v.

14 PAPE MATERIAL HANDLING,  
15 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

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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 May 2,  
24 2019 to May 9, 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 May 2, 2019. (ECF No. 55).

3 During this time, the Parties have finalized the many details of the  
4 Proposed Consent Decree and its exhibit. While the Parties have worked diligently, the  
5 Parties need a one-week extension to have the Proposed Consent Decree executed by  
6 all Parties.

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

11 Accordingly, the Parties request that this Court extend the May 2,  
12 2019 deadline for the Parties to file the Proposed Consent Decree to May 9, 2019.

13 Dated: May 2, 2019

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

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

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18 Dated: May 2, 2019

LITTLER MENDELSON, P.C.

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

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24 I, Ryan L. Eddings, certify that the content of this document is acceptable  
25 to all persons required to sign the document as I obtained authorization for the  
26 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 9, 2019. No further extensions of time shall be granted absent a demonstrated showing of good cause.

IT IS SO ORDERED.

Dated: May 2, 2019

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE