

1 Douglas E. Watts, SBN 182274

2 WATTS LAW OFFICES

1745 Creekside Dr.

Folsom, CA 95630

3 Telephone: (916) 337-5221

4 Facsimile: (916) 404-5031

[dougwattsesq@yahoo.com](mailto:dougwattsesq@yahoo.com)

5 David M. Poore, SBN 192541

6 BROWN / POORE LLP

2200 Powell Street, Suite 745

7 Emeryville, California 94608

8 Telephone: (510) 923-6280

Facsimile: (510) 923-6285

[dpoore@kahnbrownlaw.com](mailto:dpoore@kahnbrownlaw.com)

9 Attorneys for Plaintiff

10 TANYA HUNT

11 **P O R T E R | S C O T T**

12 A PROFESSIONAL CORPORATION

Nancy J. Sheehan, SBN 109419

13 Beatriz Berumen, SBN 271249

350 University Avenue, Suite 200

14 Sacramento, California 95825

(916) 929-1481

15 (916) 927-3706 (facsimile)

[nsheehan@porterscott.com](mailto:nsheehan@porterscott.com)

16 [bberumen@porterscott.com](mailto:bberumen@porterscott.com)

17 **Attorneys for Defendants:** COUNTY OF EL DORADO and FRED KOLLAR

18 **BARKETT & GUMPERT**

Franklin G. Gumpert, SBN 66051

19 P.O. Box 661448

Sacramento, CA 95866

20 Telephone: (916) 849-2480

21 **Attorney for Defendants:** PHIL CHOVANEC, DARIN LEWIS, BOB ASHWORTH and JACKIE NOREN

22 **JACKSON LEWIS LLP**

C. Christine Maloney, SBN 226575

23 199 Fremont Street, 10<sup>th</sup> Floor

San Francisco, CA 94105

24 Telephone: (415) 394-9400

25 **Attorney for Defendant:** KEVIN HOUSE

26 ///

27 ///

28 ///

1 UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF CALIFORNIA

3 TANYA HUNT,

CASE NO. 2:10-CV-01367-FCD-KJM

4 Plaintiffs,

5 **STIPULATION REGARDING PLAINTIFF'S**  
6 **FILING OF THIRD AMENDED COMPLAINT;**  
7 **ORDER**

8 vs.

9 COUNTY OF EL DORADO; PHIL  
10 CHOVANEC; DARIN LEWIS; KEVIN  
11 HOUSE; BOB ASHWORTH; JACKIE  
12 NOREN, and Does 1 through 50, inclusive

13 Defendants.

14 **WHEREAS** the operative pleading in this matter is Plaintiff's Second Amended Complaint,  
15 filed on January 27, 2011; and

16 **WHEREAS** Plaintiff filed new charges of discrimination and retaliation with the California  
17 Department of Fair Employment and Housing ("DFEH") and the federal Equal Employment  
18 Opportunity Commission ("EEOC") arising out of her termination from employment with Defendant  
19 COUNTY OF EL DORADO on December 22, 2010; and

20 **WHEREAS** Plaintiff has obtained a Right-To-Sue letter from both the DFEH and the EEOC  
21 relative to these new charges; and

22 **WHEREAS** the parties wish to avoid the expense, delay, and consumption of this Court's time  
23 with a noticed motion for leave of court to file Plaintiff's *Third* Amended Complaint;

24 The parties to this case do hereby stipulate and agree that Plaintiff TANYA HUNT shall file and  
25 serve her Third Amended Complaint in this matter within seven (7) days of the date this Stipulation is  
26 signed by counsel for Defendant COUNTY OF EL DORADO. It is further stipulated to by and  
27 between counsel for all parties that Defendants shall have the option of filing a notification with the  
28

1 Court that their Answer to the Second Amended Complaint (filed January 27, 2011) shall be deemed to  
2 be their answer to this Third Amended Complaint, or filing a separate answer to the Third Amended  
3 Complaint.  
4

5 **IT IS SO STIPULATED.**

6  
7 Dated: April 14, 2011

**WATTS LAW OFFICES**

8  
9 By/Douglas E. Watts/ (as authorized on 04/14/11 )  
10 Douglas E. Watts  
11 Attorney for Plaintiff  
TANYA HUNT

12 Dated: April 14, 2011

**BROWN / POORE LLP**

13  
14 By/David M. Poore/ (as authorized on 04/14/11 )  
15 David M. Poore  
16 Co-Attorney for Plaintiff  
TANYA HUNT

17  
18 Dated: April 14, 2011

**BARKETT & GUMPERT**

19  
20 By/Franklin G. Gumpert/ (as authorized on 04/14/11)  
21 Franklin G. Gumpert  
22 Attorney for Defendants  
PHIL CHOVANEC, DARIN LEWIS, BOB  
23 ASHWORTH and JACKIE NOREN

24 Dated: April 14, 2011

**JACKSON LEWIS LLP**

25  
26 By/C. Chistine Maloney/ (as authorized on 04/14/11 )  
27 C. Christine Maloney  
28 Attorney for Defendant  
KEVIN HOUSE

1 Dated: April 14, 2011

2 **PORTER SCOTT**  
3 **A PROFESSIONAL CORPORATION**

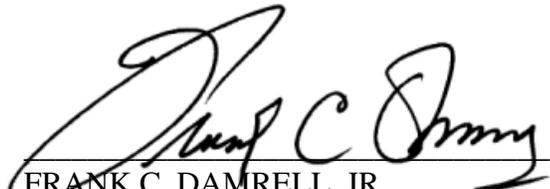
4 By/Nancy J. Sheehan/ (as authorized on 04/14/11 )  
5 Nancy J. Sheehan  
6 Beatriz Berumen  
7 Attorneys for Defendants  
8 COUNTY OF EL DORADO and  
9 FRED KOLLAR

10  
11 **ORDER**

12 Having reviewed the above Stipulation, and good cause appearing.

13 **IT IS SO ORDERED.**

14  
15 Dated: April 14, 2011

16   
17 FRANK C. DAMRELL, JR.  
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28