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 17 UNITED STATES DISTRICT COURT
 18 EASTERN DISTRICT OF CALIFORNIA

20 EQUAL EMPLOYMENT OPPORTUNITY
 COMMISSION,
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 Plaintiff,
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 v.
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 WAL-MART STORES, INC.,
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 Defendant.
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Case No. 11-CV-03327-JAM-CKD

**STIPULATION AND ORDER
 EXTENDING FACT DISCOVERY
 DEADLINE**

Complaint Filed: December 15, 2011

1 Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) and Defendant
2 Wal-Mart Stores, Inc. (“Defendant”) (collectively, the “Parties”) hereby stipulate, by and through
3 their respective counsel, as follows:

4 WHEREAS, the Court’s November 28, 2012 Order (“Order”) for this matter set various
5 procedural deadlines and dates including setting the deadline for fact discovery to March 15,
6 2013;

7 WHEREAS, the EEOC propounded certain document requests, seeking production prior
8 to the March 15, 2013 fact discovery deadline;

9 WHEREAS, the Parties met and conferred in good faith regarding certain of the EEOC’s
10 document requests and have reached an agreement regarding the scope of documents to be
11 produced by Defendant;

12 WHEREAS, Defendant has notified the EEOC that Defendant is diligently working to
13 produce the agreed upon documents but will not be able to complete its production by the March
14 15, 2013 fact discovery deadline;

15 WHEREAS, the EEOC noticed the deposition of Wal-Mart employee Ben Souza to be
16 held prior to the March 15, 2013 fact discovery deadline;

17 WHEREAS, the Parties met and conferred in good faith to reschedule Mr. Souza’s
18 deposition for March 18, 2013, three days after the March 15, 2013 fact discovery deadline;

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1 THEREFORE, the Parties stipulate to continue the deadline for fact discovery, by a period
2 of three weeks, from March 15, 2013 to April 5, 2013; we request that no other dates or deadlines
3 be changed.

4 IT IS SO STIPULATED.

6 Dated: March 13, 2013

MORGAN, LEWIS & BOCKIUS LLP

8 By: /s/ L. Julius M. Turman
9 L. JULIUS M. TURMAN
10 PHILIP J. SMITH
Attorneys for Defendant
WAL-MART STORES, INC.

11 Dated: March 13, 2013

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

14 By /s/ David F. Offen-Brown
15 DAVID F. OFFEN-BROWN
Attorneys for Plaintiff EEOC

18 IT IS SO ORDERED.

19 Dated: 3/13/2013

/s/ John A. Mendez
HON. JOHN A. MENDEZ
United States District Court Judge