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13 *PLACER ARC*

14
 15 UNITED STATES DISTRICT COURT
 16 EASTERN DISTRICT OF CALIFORNIA
 17

18 U.S. EQUAL EMPLOYMENT OPPORTUNITY
 COMMISSION,
 19
 20 Plaintiff,
 21 vs.
 22 PLACER ARC d/b/a PLACER ADVOCACY
 RESOURCES & CHOICES,
 23
 24 Defendant.

Case No.: 2:13-cv-0577-KJM-EFB

**JOINT STIPULATION TO EXTEND
 TIME PURSUANT TO FED. R. CIV. P.
 30(e) TO REVIEW DEPOSITION
 TRANSCRIPT and [Proposed] ORDER
 PURSUANT TO EASTERN DISTRICT
 LOCAL RULE 144**

The Honorable Kimberly J. Mueller
 Magistrate Judge Edmund F. Brennan

1 Whereas the continuation of Charging Party Homeyra Kazerounian's deposition took place
2 on June 13, 2014;

3 Whereas Plaintiff EEOC received a copy of Ms. Kazerounian's deposition transcript on June
4 24, 2014 and Ms. Kazerounian has thirty days from this date to review her deposition transcript
5 pursuant to Federal Rule of Civil Procedure 30(e);

6 Whereas Plaintiff's counsel, Debra A. Smith, was on family medical leave in Florida from
7 June 14 through June 28, 2014;

8 Whereas Plaintiff EEOC inadvertently failed to provide a copy of Ms. Kazerounian's
9 transcript to her during Ms. Smith's absence;

10 Whereas Ms. Smith was unaware that a copy of Ms. Kazerounian's transcript had not been
11 mailed to Ms. Kazerounian while Ms. Smith was on leave;

12 Whereas Ms. Smith first learned that Ms. Kazerounian did not receive a copy of her
13 transcript until July 10, 2014 when she was anticipating receiving any corrections Ms. Kazerounian
14 may have made;

15 Whereas Ms. Smith is scheduled to take another two week medical leave of absence
16 beginning July 14 through July 28, 2014;

17 Whereas it would be extremely difficult for Ms. Kazerounian to review her 285 page
18 deposition transcript in English within the next few days before Ms. Smith goes on leave; and

19 Whereas Plaintiff EEOC and Defendant Placer ARC d/b/a Placer Advocacy, Resources and
20 Choices (Placer ARC) both agree that an extension of the Fed. R. Fed. P. 30(e) thirty day deadline
21 though August 15, 2014, approximately three additional weeks, would allow Ms. Kazerounian
22 sufficient time to review her deposition and Ms. Smith sufficient time to review any changes Ms.
23 Kazerounian may make without imposing any undue burden on any of the parties, it is therefore:

24 STIPULATED by and between the undersigned counsel that, pursuant to Rule 30(e) of the
25 Federal Rules of Civil Procedure and Local Rule 144(a) of the Eastern District of California, Ms.

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1 Kazerounian be given additional time through August 15, 2014 to review and identify any changes
2 that may be needed to correct her deposition testimony of June 13, 2014.

3
4 **EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

REDIGER, McHUGH & OWENSBY, LLP

5 /s/ Debra A. Smith
6 DEBRA A. SMITH
7 Attorney for Plaintiff EEOC

/s/ Robert L. Rediger
8 ROBERT L. REDIGER
9 Attorney for Defendant Placer ARC

10 DATED: July 11, 2014.

DATED: July 11, 2014.

11 **IT IS SO ORDERED.**

12 DATED: July 21, 2014.


13 EDMUND F. BRENNAN
14 UNITED STATES MAGISTRATE JUDGE
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