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8 Attorneys for Defendant
 9 ADVANCED CALL CENTER TECHNOLOGIES,
 LLC

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA
 14 SACRAMENTO DIVISION

16 DEVRA KEOKONGCHACK, individually
 and on behalf of all others similarly
 17 situated,

18 Plaintiff,

19 v.

20 ADVANCED CALL CENTER
 TECHNOLOGIES, LLC, and DOES 1-50,
 21 inclusive.

22 Defendants.

Case No. 13cv1385 TLN (AC)

**STIPULATION AND ORDER TO STAY
 CASE PENDING MEDIATION**

1 Plaintiff Devra Keokongchack (“Plaintiff”) and Defendant Advanced Call Center
2 Technologies, LLC (“Defendant”) (collectively, the “Parties”), by and through their respective
3 counsel of record, hereby stipulate and agree as follows:

4 1. **WHEREAS**, in the interest of efficiency and economy, the Parties agree that there is
5 merit in pursuing an early mediation of all issues between the Parties.

6 2. **WHEREAS**, the Parties have already secured a commitment from mediator Michael
7 Dickstein to conduct a mediation on November 13, 2013.

8 3. **WHEREAS**, in order to have effective discussions and mediate this case, the Parties
9 have agreed to an informal exchange of discovery regarding Plaintiff's claims and Defendant's
10 defenses.

11 4. **WHEREAS**, the Parties want to engage in the mediation process without the
12 litigation burdens associated with formal discovery and motion practice, and want to preserve their
13 rights to complete discovery before trial in the event that this case is not resolved at mediation, the
14 Parties are requesting that this case be stayed until, and in the event that, the November 13, 2013
15 mediation is unsuccessful.

16 5. **WHEREAS**, no case management deadlines have yet been set in this case and a trial
17 date has not yet been assigned.

18 6. **WHEREAS**, the Parties’ request is not made for the purpose of delay or any other
19 improper purpose.

20 7. **WHEREAS**, the Parties agree that the stay will be lifted on, and that the parties will
21 file an updated joint status report with the Court on or before, November 27, 2013.

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1 **THEREFORE**, in light of the Parties' agreement to proceed to mediation and in an effort to
2 minimize costs, the Parties respectfully request this Court stay formal discovery and all deadlines in
3 this case, including the deadline for the exchange of initial disclosures and the deadline for
4 submitting a joint status report and discovery plan, until after the mediation is completed.

5 **IT IS SO STIPULATED.**

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7 Dated: September 6, 2013

8 By: /s/ Michael G. Leggieri
9 MICHAEL E. BREWER
10 MICHAEL G. LEGGIERI
11 LITTLER MENDELSON, P.C.
12 Attorneys for Defendant
13 ADVANCED CALL CENTER
14 TECHNOLOGIES, LLC

15 Dated: September 6, 2013

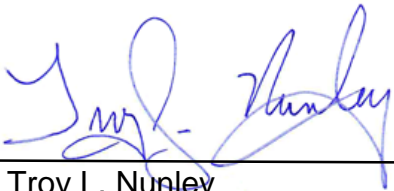
16 BY: /s/ Charles A. Jones [with permission]
17 CHARLES A. JONES
18 KELLY MCINERNEY
19 JONES LAW FIRM
20 Attorneys for Plaintiff
21 DEVRA KEOKONGCHACK

22 **ORDER**

23 The Court, having considered the Parties' stipulation for a stay pending mediation, orders
24 that this matter is hereby stayed pending the Parties' private mediation currently scheduled for
25 November 13, 2013. The stay shall be lifted on November 27, 2013, and the Parties shall file an
26 updated joint status report with the Court on or before November 27, 2013 advising the Court of the
27 status of the case and a proposed discovery plan.

28 **IT IS SO ORDERED.**

Dated: September 9, 2013



Troy L. Nunley
United States District Judge