1	WILLIAM R. TAMAYO, SBN 084965 (CA) JONATHAN T. PECK, SBN 12303 (VA) LINDA ORDONIO DIXON, SBN 172830 (CA)		
2			
3	U.S. EQUAL EMPLOYMENT OPPORTUNITY (San Francisco District Office	COMMISSION	
4	450 Golden Gate Ave., 5 th Floor West P.O. Box 36025		
5	San Francisco, CA 94102 Telephone No. (415) 522-3070		
6	Fax No. (415) 522-3425 Linda.Ordonio-Dixon@eeoc.gov		
7	Attorneys for Plaintiff EEOC		
8	TIM K. GARRETT, SBN 012084 (TN)		
9	BASS, BERRY & SIMS PLC 150 Third Avenue South, Suite 2800		
10	Nashville, TN 37201 Telephone No. (615) 742-6200		
11	Fax No. (615) 742-6293 tgarrett@bassberry.com		
12	Attorneys for Defendant		
13	[Additional Counsel on following page.]		
14			
15	UNITED STATES I	DISTRICT COURT	
16	EASTERN DISTRICT OF CALIFORNIA		
17	U.S. EQUAL EMPLOYMENT OPPORTUNITY	Case No : 2:14-CV-01623-TLN-KIN	
18	COMMISSION,	Cusc 110 2.11 C v 01023 1211 1811	
19	Plaintiff,	JOINT STIPULATION and ORDER TO	
20	vs.	CONTINUE DISCOVERY DEADLINES	
21	DIALYSIS CLINIC, INC.,		
22	Defendant.		
23			
24			
25			
26			
27			
28			

BARBARA A. COTTER, SBN 142590 COOK BROWN LLP 555 Capital Mall, Suite 425 Sacramento, CA 95814
Telephone No. (916) 442-3100
Facsimile (916) 442-4227
bcotter@cookbrown.com Attorneys for Defendant

1

Plaintiff Equal Employment Opportunity Commission (EEOC) and Defendant Dialysis Clinic, Inc. (DCI), hereby jointly request that the Court extend the March 16, 2015 discovery cut off deadline and the May 14, 2015 expert disclosure deadline set out in the court's Pretrial Scheduling Order dated December 5, 2014. [Docket No 11.] The parties have made no prior requests to extend case deadlines.

Federal Rule of Civil Procedure 6(b)(1) allows the court "for cause shown" and "in its discretion" to grant a "request" for an extension of time. Good cause exists to extend the discovery cut off deadline. The parties received VDRP mediator referrals two weeks ago. Due to the availability of counsel and the selected mediator, a mediation could not be scheduled until February 27, 2015. In order to preserve the time and resources of the parties, several depositions will be delayed until the week after the mediation. If the requested extension is not granted and the mediation is unsuccessful, the parties will not have sufficient time to complete any follow-up discovery. Granting the requested extension will not affect any other deadlines in this case.

Upon the foregoing, the parties respectfully request that the Court continue the above referenced dates as follows:

Discovery cut off deadline: May 15, 2015

Expert Discovery Disclosure Deadline: June 12, 2015

27

28

1		
2	Respectfully submitted,	
3		
4	Dated: January 8, 2015 By:/s/Linda S. Ordonio Dixon	
5	Dated: January 8, 2015 By:/s/Linda S. Ordonio Dixon LINDA S. ORDONIO-DIXON Atty for Plaintiff EEOC	
6	By: /s/Timothy K. Garrett	
7	TIMOTHY K. GARRETT	
8	Atty for Defendant DCI *as authorized on January 8, 2015	
9		
10		
11	It is so ORDERED.	
12 13	Dated: January 9, 2015	
14	Troy L. Nunley	
15	United States District Judge	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		