

1 THEODORA R. LEE tlee@littler.com
 2 LITTLER MENDELSON, P.C.
 3 650 California Street, 20th Floor
 4 San Francisco, CA 94108-2693
 5 Telephone: (415) 677-3132
 6 Facsimile: (415) 399-8490

7 Attorneys for Defendant
 8 CADIT COMPANY, INC.

9 WILLIAM R. TAMAYO (SB# 084965)
 10 DAVID F. OFFEN-BROWN (SB# 063321)
 11 RAYMOND T. CHEUNG (SB# 176086) raymond.cheung@eeoc.gov
 12 EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
 13 San Francisco District Office
 14 350 The Embarcadero, Suite 500
 15 San Francisco, CA 94105-1260
 16 Telephone: (415) 625-5649
 17 Facsimile: (415) 625-5657

18 Attorneys for Plaintiff
 19 EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

20 UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA
 22 SAN FRANCISCO DIVISION

23 EQUAL EMPLOYMENT
 24 OPPORTUNITY COMMISSION,

25 Plaintiff,

26 vs.

27 CADIT COMPANY, INC.,

28 Defendant.

CASE NO. C-08-03151 SI

**STIPULATION TO EXTEND TIME FOR
 FILING RULE 26(F) REPORT,
 COMPLETE INITIAL DISCLOSURES,
 FILE CASE MANAGEMENT
 STATEMENT, AND INITIAL CASE
 MANAGEMENT CONFERENCE;
 DECLARATION OF RAYMOND T.
 CHEUNG IN SUPPORT THEREOF; AND
 [PROPOSED] ORDER**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Pursuant to Northern District of California Local Rule 6-2(a), it is hereby stipulated by and between the parties hereto, through their respective counsel, that:

1. The last day on which to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement to be continued from September 26, 2008 to November 14, 2008; and

2. The scheduling of the Initial Case Management Conference to be continued from October 3, 2008 to December 5, 2008.

DATED: September 18, 2008 LITTLER MENDELSON, LLP

By: /s/ Theodora R. Lee
THEODORA R. LEE

Attorneys for Defendant
CADIT COMPANY, INC.

DATED: September 18, 2008 EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

By: /s/ Raymond T. Cheung
RAYMOND T. CHEUNG
Attorneys for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF RAYMOND T. CHEUNG

I, Raymond T. Cheung, declare:

1. I am an attorney at law licensed to practice before this Court. I am an attorney for Plaintiff Equal Employment Opportunity Commission. If called as a witness, I would and could competently testify thereto to all facts within my personal knowledge except where stated upon information and belief.

2. On July 1, 2008, the Court issued an order setting initial case management conference and ADR deadlines. The Court scheduled September 26, 2008 as the last day on which to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement.

3. The Court also scheduled the Initial Case Management Conference for October 3, 2008 at 2:00 p.m.

4. Consistent with L.R. 6-2(a), the parties request through this Stipulation and [Proposed] Order a continuance of the above schedule.

5. The parties informally exchanged initial disclosure documents on September 3, 2008.

6. The parties engaged in multiple substantive settlement discussions, including an in-person settlement conference on September 11, 2008. The parties reached a tentative settlement agreement at that time and are in the process of finalizing the terms of the settlement.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. The parties have not previously sought nor has the Court ordered a continuance of the case scheduling or time modification in this matter.

8. The stipulated proposed continuance would not have a substantive effect on the scheduling of this case and may have a positive effect on judicial economy by allowing the parties to resolve the matter without imposing any additional burden on the court's resources.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 18th day of September, 2008 at San Francisco, California.

/s/ Raymond T. Cheung

RAYMOND T. CHEUNG

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____



Hon. SUSAN ILLSTON
Judge, United States District Court