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James A. Batson, Esq. (NY Bar 2556413) (*Pro Hac Vice*)
LIDDLE & ROBINSON, L.L.P.
800 Third Avenue
New York, New York 10022
212-687-8500
jbatson@liddlerobinson.com
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BERNADETTE REED,

Plaintiff,

-against-

UBS SECURITIES, LLC,

Defendant.

No. CV-09-5237-MHP

STIPULATION AND [~~PROPOSED~~] ORDER
REGARDING EXTENSION OF
DEADLINE FOR PLAINTIFF TO FILE A
MOTION FOR LEAVE TO AMEND THE
COMPLAINT

Plaintiff, Bernadette Reed, through her attorneys, Liddle & Robinson, L.L.P., submits the following stipulation to request an extension of time to submit her Motion For Leave To Amend The Complaint (“the Motion.”) Defendant UBS Securities, LLC has consented to this request.

No previous requests to extend the deadline to file the Motion have been made.

1 Plaintiff filed her initial Charge of Discrimination (“Initial Charge”) with the EEOC on
2 March 2, 2009. The EEOC provided UBS with a copy of Plaintiff’s Initial Charge thereafter.
3

4
5 On July 22, 2009, Plaintiff requested a Notice of Right to Sue letter for her Initial
6 Charge. On August 11, 2009, Plaintiff received a Notice of Right to Sue letter for her Initial
7 Charge.
8

9 On November 4, 2009, Plaintiff filed her Complaint in the United States District
10 Court Northern District of California, San Francisco Division, initiating this proceeding. On the
11 same day, Plaintiff submitted an Amended Charge of Discrimination (“Amended Charge”) to the
12 Boston EEOC office, where her Initial Charge had been processed. The Amended Charge
13 included an additional claim for retaliation based on new facts that occurred since her filing of the
14 Initial Charge.
15

16 On March 5, 2010, Plaintiff requested a Notice of Right to Sue letter for her
17 Amended Charge.
18

19 After subsequent correspondence with the EEOC, Plaintiff was informed that the
20 Boston EEOC office had failed to update the system properly and, as such, the Amended Charge
21 had never been processed. Pursuant to the EEOC Investigator’s instruction, on March 31, 2010,
22 Plaintiff submitted a new Charge of Discrimination (“March 31 Charge”) to the New York EEOC
23 office, which included the additional facts and claim for retaliation. Simultaneously, Claimant
24 requested an immediate Notice of Right to Sue letter for the March 31 Charge.
25

26 The EEOC has not yet responded to Plaintiff’s request for a Notice of Right to Sue letter
27 for the March 31 Charge. Accordingly, Plaintiff cannot make a Motion For Leave To Amend
28 The Complaint to include her additional claim for retaliation at this time. Plaintiff therefore

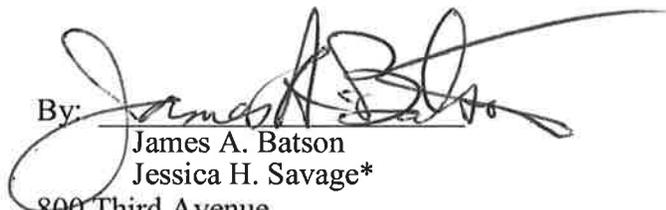
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respectfully requests that the Court sign the attached Order to grant Plaintiff an extension of time until June 28, 2010, or until such time as the Court deems fit, to file her Motion For Leave To Amend The Complaint. As mentioned above, Defendant has consented to this extension.

The requested time modification will have no effect on the schedule for the case.

Dated: New York, New York
May 3, 2010

LIDDLE & ROBINSON, L.L.P.

By: 

James A. Batson
Jessica H. Savage*
800 Third Avenue
New York, New York 10022
(212) 687-8500
Attorneys for Plaintiff

* Not yet admitted to the Bar
Pro Hac Vice application to follow

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ORDER

On the stipulation of plaintiff, and good cause appearing therefore,

IT IS ORDERED that Plaintiff's stipulation be and is hereby adopted as the Order of the Court and that Plaintiff's time to file a Motion For Leave To Amend The Complaint is extended until June 28, 2010.

Dated: May 4 , 2010.



1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

3 ----- X
4 BERNADETTE REED, :

09-5237 MHP

5 Plaintiff, :

PROOF OF SERVICE

6 -against- :

7 UBS SECURITIES, LLC, :

8 Defendant. X
9 -----

10 I am a resident of the State of New York, over the age of eighteen years, and not a
11 party to the within action. My business address is Liddle & Robinson, L.L.P., 800 Third Avenue,
12 New York, NY 10022. On May 3, 2010, I served the within document:

13 STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION OF DEADLINE
14 FOR PLAINTIFF TO FILE A MOTION FOR LEAVE TO AMEND THE COMPLAINT

15 by transmitting via electronic mail the document(s) listed above to the address listed below
16 on this date before 5:00 p.m. Pacific Time.

17 Mr. Jeffrey D. Wohl
18 Paul, Hastings, Janofsky & Walker LLP
19 55 Second Street, 24th Floor
20 San Francisco, CA 94105-3441
21 jeffwohl@paulhastings.com
22 415-856-7255

23 I declare under penalty of perjury under the laws of New York that the foregoing is true
24 and correct. Executed at New York, New York, on May 3, 2010.

25 _____
26 Jessica H. Savage
27
28