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

14 **UNITED STATES EQUAL**  
**EMPLOYMENT OPPORTUNITY**  
 15 **COMMISSION,**

16 **Plaintiff,**

17 **v.**

18 **FREMONT AUTOMOBILE**  
**DEALERSHIP, LLC dba FREMONT**  
 19 **TOYOTA,**

20 **Defendant.**

**CASE NO. CV 11-04131 CRB**

**STIPULATION AND [PROPOSED] ORDER**  
**FOR CONTINUANCE**

21 Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
 22 (hereinafter "Commission" or "EEOC") and Defendant FREMONT AUTOMOBILE  
 23 DEALERSHIP, LLC, dba FREMONT TOYOTA (hereinafter "Fremont Toyota"), through their  
 24 respective counsel have conducted numerous meet and confers regarding early mediation of the  
 25 above case. The parties have agreed to utilize the Court's early ADR program and have filed a  
 26 stipulation/order requesting that this case be referred to mediation with Jeffrey A. Ross, a respected  
 27 private mediator with the Court's ADR program, who has decades of experience litigating the type  
 28 of employment discrimination issues similar to those in the present case.

1 The parties jointly request the following continuance to accommodate the schedules and  
2 availability of the selected mediator and individuals necessary to the ADR process in order to  
3 maximize the likelihood of a successful mediation. Accordingly, the parties respectfully submit the  
4 following stipulated request to:

- 5 1) Continue the deadline for Defendant to file its ANSWER, currently set for October 31, 2011,  
6 by an additional 14 days.  
7 2) Continue all other pending deadlines, including but not limited to the ADR deadline and the  
8 initial Case Management Conference, currently set for December 9, 2011, by an additional  
9 60 days.

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12 Date: October 26, 2011

By: /s/ Raymond T. Cheung  
Raymond T. Cheung  
U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
San Francisco District Office

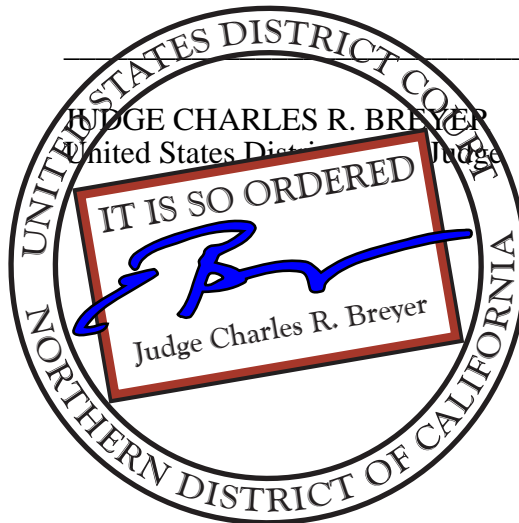
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14  
15 Date: October 26, 2011

By: /s/ Kurt T. Hendershott  
Kurt T. Hendershott  
Chapman & Intrieri, LLP  
Attorney for Defendant  
Fremont Automobile Dealership, LLC

**ORDER GRANTING CONTINUANCE**

**IT IS SO ORDERED.** Case Management Conference reset for February 10, 2012 at 8:30 a.m.

Dated: October 27, 2011



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