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12 **Attorneys for Defendant**  
13 **CONSTELLATION WINES U.S., INC.**

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

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

17 **Plaintiff,**

18 **v.**

19 **CONSTELLATION WINES U.S., INC.**  
**dba DUNNEWOOD VINEYARDS,**

20 **Defendant.**

**CASE NO. CV 11-04437 JSW**

**JOINT MOTION TO MODIFY**  
**SCHEDULING ORDER;**  
**DECLARATION; ~~PROPOSED~~ ORDER**

**Oral Argument Not Requested**

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22 **Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
23 **(hereinafter “Commission” or “EEOC”)** and Defendant **CONSTELLATION WINES U.S., INC dba**  
24 **DUNNEWOOD VINEYARDS (hereinafter “Constellation”),** through their respective counsel, hereby  
25 jointly move for a modification of the Court’s January 30, 2012 Order Scheduling Trial and Pretrial  
26 Matters [Dkt. No. 24].  
27

28 With the exception of a stipulation for additional time to conduct discovery prior to the Court

1 appointed ADR process, there has not been a prior modification of the Court's Scheduling Order in this  
2 case. As detailed in the accompanying Declaration, very good cause exists to grant the modification of  
3 the current Scheduling order.

4  
5 On behalf of Plaintiff U.S. EEOC

On behalf of Defendant Constellation Wines U.S.,  
Inc. dba Dunnewood Vineyards

6 Dated: July 10, 2012

Dated: July 10, 2012

7 U. S. EQUAL EMPLOYMENT  
8 OPPORTUNITY COMMISSION

KAUFMAN DOLOWICH VOLUCK &  
GONZO LLP

9 /s/ William R. Tamayo  
10 William R. Tamayo, Regional Attorney

/s/ Elizabeth Williams  
Elizabeth Williams  
Attorney for Defendant

11 /s/ Jonathan T. Peck  
Jonathan T. Peck, Supervisory Trial Attorney

12 /s/ Raymond T. Cheung  
13 Raymond T. Cheung, Senior Trial Attorney  
Attorneys for Plaintiff U.S. EEOC

14 GENERAL ORDER 45 ATTESTATION

15 I, Raymond T. Cheung, am the ECF User whose ID and password are being used to file this  
16 Joint Motion to Modify Scheduling Order and [Proposed] Order. In compliance with General Order 45,  
17 X.B., I hereby attest that Elizabeth Williams has concurred in this filing.  
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19 Date: July 10, 2012

By: /s/ Raymond T. Cheung  
RAYMOND T. CHEUNG

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~~[Proposed]~~ORDER

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GOOD CAUSE APPEARING THEREFORE, the Court’s January 30, 2012 Scheduling Order is hereby modified as follows:

<u>Current Deadlines</u>	<u>New Deadlines</u>
Jury Trial Date: 3/11/2013	4/1/2013
Pretrial Conference: 2/11/2013	3/4/2013
Last Day to Hear Dispositive Motions: 12/7/2012	1/25/2013
Last Day for Expert Discovery: 11/7/2012	12/26/2012
Close of Non-expert Discovery: 10/8/2012	11/26/2012
Further Case Management Conference: 10/12/2012	<del>11/23/2012</del> 12/7/12
Joint Supplemental Case Management Statement due: 10/5/2012	<del>11/16/2012</del> 11/30/12

IT IS SO ORDERED.

Dated: July 11, 2012 \_\_\_\_\_

  
 \_\_\_\_\_  
 HON. Jeffrey S. White  
 United States District Court Judge