



1 ROD M. FLIEGEL, Bar No. 168289  
[rfliegel@littler.com](mailto:rfliegel@littler.com)  
2 ALISON S. HIGHTOWER, Bar No. 112429  
[ahightower@littler.com](mailto:ahightower@littler.com)  
3 ROXANNA IRAN, Bar No. 273625  
[riran@littler.com](mailto:riran@littler.com)  
4 LITTLER MENDELSON, P.C.  
650 California Street, 20th Floor  
5 San Francisco, California 94108.2693  
Telephone: 415.433.1940  
6 Facsimile: 415.399.8490

7 Attorneys for Defendant  
AEROTEK, INC.

THE LAW OFFICES OF DEVIN H. FOK  
Devin H. Fok (SBN #256599)  
[devin@devinfoklaw.com](mailto:devin@devinfoklaw.com)  
P.O. Box 7165  
Alhambra, CA 91802-7165  
Phone: (310) 430-9933  
Fax: (323) 563-3445

A NEW WAY OF LIFE REENTRY  
PROJECT  
Ely Grinvald (SBN #285475)  
[egrinvald@anewwayoflife.org](mailto:egrinvald@anewwayoflife.org)  
958 E 108th Street  
Los Angeles, CA 90059  
Phone: (323) 563-3575  
Fax: (323) 563-3445

NICHOLS KASTER, PLLP  
Rebekah L. Bailey, CA Bar No. 258551  
[bailey@nka.com](mailto:bailey@nka.com)  
11 E. Michelle Drake, MN Bar No. 0387366\*  
[drake@nka.com](mailto:drake@nka.com)  
12 Anna P. Prakash, MN Bar No. 0351362\*  
[aprakash@nka.com](mailto:aprakash@nka.com)  
13 4600 IDS Center  
80 South 8th Street  
14 Minneapolis, MN 55402  
Phone: (612) 256-3200  
15 Fax: (612) 338-4878  
16 \*admitted *pro hac vice*

Attorneys for Individual and Representative  
Plaintiff  
JOSE RUBIO-DELGADO

1 Plaintiff JOSE RUBIO-DELGADO and Defendant AEROTEK, INC. (collectively, the  
2 “Parties”), by and through their respective attorneys of record, hereby submit the following status  
3 report and pre-mediation discovery plan.

4 1. WHEREAS, the Parties attended mediation in this case on June 18, 2014, but did not  
5 reach a settlement.

6 2. WHEREAS, the Parties have agreed to continue settlement discussions and have  
7 scheduled a mediation for September 16, 2014.

8 3. WHEREAS, pursuant to this Court’s Order of July 25, 2014, the Parties are to submit  
9 a Joint Status Report and Discovery Plan today.

10 4. WHEREAS, the Parties have held additional “meet and confer” discussions, resulting  
11 in an agreement to engage in certain formal discovery prior to their September 16 mediation that  
12 both sides believe will enhance the likelihood of a settlement being reached, without expending  
13 resources on discovery that can be deferred until after the mediation.

14 5. WHEREAS, the Parties have agreed that, prior to the September 16 mediation,  
15 Plaintiff will respond to certain document requests and Defendant will respond to certain requests for  
16 admission, interrogatories, and document requests.

17 6. WHEREAS, the Parties have agreed that the responses to the agreed upon discovery  
18 referenced in Paragraph 5 above shall be due on August 15, 2014, and that responses to all other  
19 written discovery that has been served in this case shall not be due until 30 days following the  
20 September 16 mediation, absent further agreement or court order. All objections and rights with  
21 regard to such discovery are preserved.

22 7. WHEREAS, the Parties have agreed that, within seven (7) days of the September 16  
23 mediation, they will provide the Court with either notice that they have settled or an updated Joint  
24 Status Report and Discovery Plan for the remainder of the case.

25 WHEREFORE, the Parties jointly request that the instant Stipulation be granted, that  
26 discovery continue as outlined above, and that the Court set September 23, 2014 as the deadline for

27 ///

1 the parties to either inform the Court that they have settled or file an updated Joint Status Report and  
2 Discovery Plan for the remainder of the case.

3 **IT IS SO STIPULATED:**

4 Dated: August 1, 2014

6 /s/ E. Michelle Drake  
7 E. Michelle Drake  
8 ANNA P. PRAKASH  
9 NICHOLS KASTER, PLLP  
Attorneys for Plaintiff  
JOSE RUBIO-DELGADO

10 Dated: August 1, 2014

12 /s/ Rod M. Fliegel  
13 ROD M. FLIEGEL  
14 ALISON S. HIGHTOWER  
15 ROXANNA IRAN  
16 LITTLER MENDELSON, P.C.  
Attorneys for Defendant  
AEROTEK, INC.

17 **PROPOSED ORDER**

18 The Court grants the parties' Joint Status Report and Stipulation Regarding  
19 Discovery, and orders that, on September 23, 2014, the Parties either file a notice informing the  
20 Court that they have settled or file an updated Joint Status Report and Discovery Plan.

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22 DATED: 08/04, 2014

26 Firmwide:128241654.1 071691.1029

