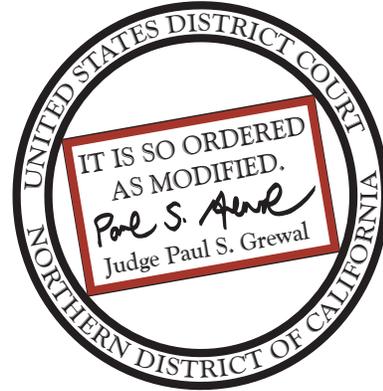


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 6 GUARDSMARK, LLC



8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

11 U.S. EQUAL EMPLOYMENT  
 12 OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 GUARDSMARK, LLC,

16 Defendant.

CASE NO. CV 11-3190 PSG

**JOINT STIPULATION TO CONTINUE  
 CASE MANAGEMENT CONFERENCE;  
 [PROPOSED] ORDER**

Ctrm.: 5  
 Judge: Hon. Paul S. Grewal

17  
 18 Pursuant to Federal Rule of Civil Procedure 16(b), Plaintiff Equal Employment  
 19 Opportunity Commission and Defendant Guardsmark, LLC hereby request an extension of the  
 20 case management hearing and related deadlines as set out in this Court's November 9, 2011 Order  
 21 [Docket No. 15]. The Scheduling Conference is presently calendared for December 20, 2011.

22 Good cause exists for the granting of an extension. **First**, lead counsel for Defendant has  
 23 been subpoenaed for jury service in Alameda County on December 20, 2011, the date of the case  
 24 management conference in this case. Having already taken one extension, he must attend Court  
 25 on that day. **Second**, lead counsel for Plaintiff will be on an extended leave beginning the first  
 26 week of January to the beginning of February. **Third**, counsel have continued to make progress  
 27 in their settlement discussions, and therefore an extension may ultimately save the Court and  
 28 counsel the time and effort which would be expended if the scheduling conference were to go

1 forward as currently scheduled.

2 The Court has granted two previous extensions in this case. Based on the foregoing, the  
3 parties respectfully request that the Court extend the Case Management Dates as follows:

4 1/15/12	Deadline to conduct mediation
5 2/2/12	Last day to file Rule 26(f) Report, complete initial disclosures or 6 state objection, and file Case Management Statement
7 2/2/12	Defendant to respond to complaint
8 <b>2/14/12</b>	Initial Case Management Conference (CMC) in Court 5, 4 <sup>th</sup> Floor, San Jose at 2:00 p.m.

9 In addition, counsel for the parties and the mediator have agreed that a continuance of the  
10 Court's deadline to mediate would be prudent, given that the parties have continued to exchange  
11 information and make progress through their own efforts. Accordingly, the parties respectfully  
12 request an extension of their deadline to mediation from December 15, 2011 to January 15, 2011.

13 DATED: November 30, 2011

By: /s/ Martin D. Bern  
Martin D. Bern

14  
15 Attorneys for DEFENDANT  
GUARDSMARK, LLC

16  
17 By: /s/ Linda S. Ordonio Dixon  
Linda S. Ordonio Dixon

18 Attorney for PLAINTIFF EEOC

19 **Signature Attestation**

20 Pursuant to the Court's General Order 45, Section X.B. regarding Electronic Case Filing, I hereby  
21 attest that Linda S. Ordonio Dixon has authorized the electronic signature which appears above.

22 DATED: November 30, 2011

By: /s/ Martin D. Bern  
Martin D. Bern

23 Attorneys for DEFENDANT  
24 GUARDSMARK, LLC

25 **IT IS SO ORDERED.**

26 DATED: December 7, 2011

By:   
U.S. Magistrate Judge