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RICHARD W. WIEKING
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 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

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20 UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA

22 ELEANOR RAMACHANDRAN, an
 individual,,
 23
 Plaintiff,
 24
 v.
 25 ACCENTURE LLP, a limited liability,
 26 Defendant.
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Case No. CV12-04834-HRL
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**NOTICE OF SETTLEMENT, JOINT
 STIPULATION, AND ~~PROPOSED~~
 ORDER TO CONTINUE SUMMARY
 JUDGMENT AND EXPERT
 DISCOVERY DEADLINES**
 (RE: Dkt. No. 61)

1 TO THE HONORABLE HOWARD R. LLOYD:

2 On November 3, 2013, Plaintiff Eleanor Ramachandran ("Plaintiff") and Defendant
3 Accenture LLP ("Defendant") (collectively the "Parties") reached an agreement in principle to
4 resolve the above-referenced matter. The Parties currently are drafting a settlement agreement
5 and anticipate finalizing and implementing it, so that they can file a Request for Dismissal with
6 Prejudice within thirty (30) days.

7 Accordingly, pursuant to Civil Local Rule 7-12 of the United States District Court for the
8 Northern District of California, the Parties, by and through their undersigned counsel, hereby
9 stipulate and agree as follows:

10 WHEREAS, the cutoff date for expert discovery is November 14, 2013 (ECF 60);

11 WHEREAS, the Parties' reply briefs in support of their respective summary judgment
12 motions are due November 5, 2013 (ECF 60);

13 WHEREAS, the hearing date for the Parties' respective summary judgment motions is
14 November 26, 2013 (ECF 60); and

15 WHEREAS, to provide sufficient time to finalize their written settlement agreement, the
16 Parties request that all proceedings in this action be stayed for thirty (30) days through December
17 4, 2013, and that the deadlines for expert discovery, summary judgment briefing, and the hearing
18 for the Parties' summary judgment motions be continued to dates thereafter that are convenient
19 for the Court in the event that a final written settlement agreement proves impossible. In that
20 event, the Parties will request a further case management conference to reschedule those dates
21 that are affected by the stay.

22 NOW THEREFORE, the Parties hereby stipulate and respectfully submit as follows:

23 All proceedings in this action shall be stayed through December 4, 2013. The deadlines
24 for expert discovery, summary judgment briefing, and hearing on the Parties' respective motions
25 for summary judgment shall be continued to dates thereafter that are convenient for the Court. In
26 the event that the parties are unable to reduce the matter to a final settlement agreement, then

27 ///

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1 either or both parties may notify the Court of the need to schedule a further case management
2 conference.

3 IT IS SO STIPULATED.
4

5 DATED: November 4, 2013

SEYFARTH SHAW LLP

6 By /s/ Brian Wong

G. Daniel Newland

Brian Wong

Courtney K. Bohl

7 Attorneys for Defendant

8 ACCENTURE LLP
9

10 DATED: November 4, 2013

LE CLERC & LE CLERC LLP

11 By /s/ Christopher R. LeClerc

Christopher R. LeClerc

12 Attorneys for Plaintiff

13 ELEANOR RAMACHANDRAN
14

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

15 I, Brian Wong, attest that concurrence in the filing of this document has been obtained
16 from the signatory Christopher R. LeClerc.

17 Executed this 4th day of November, 2013 in San Francisco, California.

18 By /s/ Brian Wong

G. Daniel Newland

Brian Wong

Courtney K. Bohl

19 Attorneys for DEFENDANT

20 ACCENTURE LLP
21

ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: 11/5/13

24 
25 _____
26 Hon. Howard R. Lloyd

United States Magistrate Judge
27

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