

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

FREEMAN,

Defendant.

Case No. 8:09-CV-02573-RWT

JOINT MOTION FOR STAY OF PROCEEDINGS

Plaintiff EEOC and Defendant Freeman jointly request that this Court enter an order staying proceedings in this matter to enable the parties to conduct a mediation and explore potential resolution of the case. In support of this Motion the parties state as follows:

1. The parties have had a preliminary discussion regarding the potential for a settlement and have determined that they wish to participate in a mediation session. The parties have further agreed that they will select a private mediator for this purpose and are presently cooperating to identify an appropriate individual.

2. The current scheduling order in this case (see Paper No. 23) sets a non-expert discovery deadline of November 30, 2010, with expert discovery and other deadlines thereafter. The parties have not completed non-expert discovery.

3. The parties believe that a stay of discovery and further proceedings in this matter (with the exception of proceedings related to Defendant's Motion for Partial Summary Judgment) for a period of three (3) months will enable them to conduct the

mediation and explore the potential for resolution without incurring additional costs associated with full litigation of the case. Such stay will also serve the interest in judicial economy.

4. However, the parties do not request a stay related to Defendant's Motion for Partial Summary Judgment (Paper No. 27), which is presently set for argument before this Court on December 3, 2010 (Paper No. 28). The parties believe that resolution of the issues in that Motion will facilitate their settlement discussions.

5. The attached proposed Order staying this action provides that the parties shall submit a joint status report to the Court within ten (10) days of conclusion of mediation efforts or the conclusion of the three month stay, whichever is earlier. The status report will inform the Court of the status of settlement negotiations and, if the parties have concluded that settlement negotiations were unsuccessful, they will submit a joint proposed scheduling order setting forth new dates for the discovery and other deadlines reflected in the Court's current scheduling order.

6. A proposed Order is attached to this Motion.

Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION



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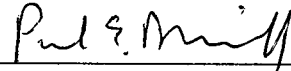
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