

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

EQUAL EMPLOYMENT OPPORTUNITY )  
 COMMISSION, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FREEMAN, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

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

**JOINT MOTION FOR ADDITIONAL 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 to resolve the case. In support of their Motion, the parties state as follows:

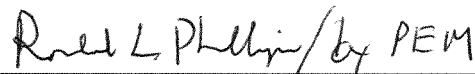
1. On October 28, 2010, this Court entered an Order staying proceedings in this matter for 90 days pending settlement discussions. That stay has expired.
2. The parties have scheduled a two day mediation session for March 30-31 in an effort to resolve this case.
3. The parties believe that an additional stay of discovery and of further proceedings in this matter will enable them to pursue a settlement without incurring additional costs associated with full litigation of the case. Such a stay will also serve the interest of judicial economy.
4. The parties seek, through the attached Proposed Order, a stay until April 15, 2011. This stay will provide the parties the opportunity to conduct their scheduled mediation session and reasonable follow-up, unencumbered by the obligations of litigating this matter.

5. The parties will submit a joint status report to the court within seven (7) days of the conclusion of mediation efforts or the expiration of the stay, whichever is earlier. The status report will inform the Court of the status of settlement negotiations. If the parties have concluded that settlement negotiations have been unsuccessful, they will also submit a joint proposed scheduling order setting both new dates for discovery and the other deadlines reflected in the Court's current scheduling order.

6. A Proposed Order is attached to this Motion.

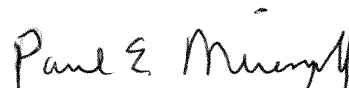
Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

/by PEM

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