EEOC v. Freeman Doc. 46

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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

JOINT STATUS REPORT AND REQUEST FOR ADDITIONAL STAY OF PROCEEDINGS

Pursuant to this Court's Order of February 4, 2011 (Paper No. 45), Plaintiff EEOC and Defendant Freeman jointly file this Status Report regarding their mediation efforts. EEOC and Freeman also jointly request an additional stay of proceedings in this matter. The parties state as follows:

- 1. Mediation of this matter took place on March 30 and 31, 2011.
- 2. The parties made progress towards settlement during mediation, but did not resolve the matter.
 - 3. Another day of mediation is scheduled for May 11, 2011.
- 4. The parties seek, through the attached Proposed Order, a stay until June 1, 2011. This stay will provide the parties the opportunity to conduct their scheduled mediation session, and any follow-up negotiations, 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

Debra M. Lawrence (Bar No. 04312)

Regional Attorney Ronald L. Phillips

Supervisory Trial Attorney

City Crescent Building, 3rd Floor

10 South Howard Street

Baltimore, MD 21201

Telephone: (410) 209-2737 Facsimile: (410) 962-4270

Pre 5 Mil

AKIN GUMP STRAUSS HAUER & FELD LLP

Donald R. Livingston (Bar No. 15787)

Paul E. Mirengoff

1333 New Hampshire Avenue, N.W.

Washington, DC 20036 Telephone: (202) 887-4000

Facsimile: (202) 887-4288 dlivingston@akingump.com

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,))	
Plaintiff,)	
v.)	
FREEMAN,) Cas	se No. RWT-09-CV-2573
Defendant.)))	

ORDER FOR ADDITIONAL STAY OF PROCEEDINGS

Upon consideration of the parties' Joint Status Report and Motion for Additional Stay of Proceedings in the above-styled and numbered action, it is **ORDERED** that the Motion for Additional Stay of Proceedings be, and it is hereby, **GRANTED**.

It is further **ORDERED** that all discovery and all proceedings in this action be, and they hereby are, **STAYED** until June 1, 2011.

It is further **ORDERED** that the parties shall submit a joint status report to the Court not later than seven (7) days after the conclusion of mediation efforts or the conclusion of the stay period, whichever is earlier. The status report may be submitted directly to chambers, rather than filed, and shall inform the Court of the status of settlement negotiations. If the parties have concluded that settlement negotiations were unsuccessful, they will also submit, along with their joint status report, a joint proposed scheduling order setting forth new dates for discovery and other deadlines reflected in the Court's current scheduling order (Paper No. 23).

TITUS
- [