

1 Anna Y. Park, CA SBN 164242
 Sue J. Noh, CA SBN 192134
 2 Rumduol Vuong, CA SBN 264392
 U.S. EQUAL EMPLOYMENT
 3 OPPORTUNITY COMMISSION
 255 East Temple Street, Fourth Floor
 4 Los Angeles, CA 90012
 Telephone: (213) 894-1083
 5 Facsimile: (213) 894-1301
 E-Mail: lado.legal@eeoc.gov
 6

7 Nechole M. Garcia, NV SBN 12746
 U.S. EQUAL EMPLOYMENT
 8 OPPORTUNITY COMMISSION
 333 Las Vegas Boulevard South, Suite 5560
 9 Las Vegas, NV 89101
 Telephone: (702) 388-5072
 10 Facsimile: (702) 388-5094
 E-Mail: nechole.garcia@eeoc.gov
 11

12 Attorneys for Plaintiff
 U.S. EQUAL EMPLOYMENT
 13 OPPORTUNITY COMMISSION

14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 U.S. EQUAL EMPLOYMENT OPPORTUNITY)
 17 COMMISSION,)

Case No.: 2:17-cv-02458-MMD-GWF

18 Plaintiff,)

19 vs.)

**JOINT STIPULATION TO MODIFY THE
 20 TERMS OF THE CONSENT DECREE**

21 LUCINDA MANAGEMENT, LLC,)
 CENTENNIAL FOOD CORPORATION dba)
 22 IHOP RESTAURANT, NELLIS FOOD)
 CORPORATION dba IHOP RESTAURANT,)
 23 VEGAS FOOD CORPORATION dba IHOP)
 RESTAURANT, CHEYENNE FOOD)
 24 CORPORATION dba IHOP RESTAURANT,)
 CRAIG FOOD CORPORATION dba IHOP)
 25 RESTAURANT, BAYSHORE FOOD)
 CORPORATION dba IHOP RESTAURANT,)
 26 DiHOP CORPORATION dba IHOP)
 RESTAURANT, COOPER STREET CLAM &)
 27 OYSTER BAR, LLC, and Does 1-5 Inclusive,)

28 Defendant.

1 **TO THE HONORABLE MIRANDA M. DU:**

2 Plaintiff U.S. Equal Employment Opportunity Commission (the “EEOC” or
3 “Commission”) and Defendants Lucinda Management, LLC, Centennial Food Corporation dba
4 IHOP Restaurant, Nellis Food Corporation dba IHOP Restaurant, Cheyenne Food Corporation
5 dba IHOP Restaurant, Craig Food Corporation dba IHOP Restaurant, Bayshore Food
6 Corporation dba IHOP Restaurant, DiHOP Corporation dba IHOP Restaurant, and Cooper
7 Street Clam & Oyster Bar, LLC (“Defendants”)(collectively, the “Parties”) hereby jointly
8 stipulate to modify the deadlines in Sections X.A and X.H of the Consent Decree in the above-
9 captioned case from March 19, 2019 to April 9, 2019.

10 Pursuant to Section VI.A of the Consent Decree, signed by this Court on February 19,
11 2019, terms of the Consent Decree may be amended or modified if made in writing, signed by
12 an authorized representative of the Parties, and approved by the Court. Section X.A of the
13 Decree requires Defendants to retain an Equal Employment Monitor (“Monitor”) within thirty
14 (30) days of the Effective Date, which is March 19, 2019. Defendants are in the process of
15 retaining a Monitor, but require additional time to finalize the arrangement. Section X.H
16 requires Defendants to establish and disseminate a Toll-Free Hotline within thirty (30) days of
17 the Effective Date, which is March 19, 2019. Defendants have encountered difficulties finding
18 a vendor to establish the Hotline. Therefore, the Parties agree that additional time is required
19 for Defendants to come into full compliance Section X.A and X.H of the Consent Decree.

20
21 / / /

22 / / /

23 / / /

24 / / /

25 / / /

26

27

28

1 As such, the Parties stipulate and respectfully request that the deadlines in Section X.A
2 and X.H of the Consent Decree be extended until April 9, 2019.

3 **IT IS SO STIPULATED.**

4 Dated: March 26, 2019

Dated: March 26, 2019

5 U.S. EQUAL EMPLOYMENT
6 OPPURTUNITY COMMISSION

WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER, LLP.

7 /s/ Nechole Garcia _____
8 Nechole Garcia
9 Nevada Bar No. 12746
10 333 Las Vegas Blvd. South, Suite 5560
11 Las Vegas, NV 89101
12 Attorney for Plaintiff

/s/ Richard Dreitzer _____
Richard I. Dreitzer, Esq.
Nevada Bar No. 6626
James T. Tucker, Esq.
Nevada Bar No. 12507
300 South Fourth Street, Eleventh Floor
Las Vegas, NV 89101
Attorney for Defendants

13 **PROPOSED ORDER**

14 **IT IS SO ORDERED.**

15
16 DATED: 3/27/2019



17 THE HONORABLE MIRANDA M. DU,
18 UNITED STATES DISTRICT JUDGE

1 I am, and was at the time the herein mentioned mailing took place, a citizen of the
2 United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

3 I am employed in the Legal Unit of the Los Angeles District Office of the United States
4 Equal Employment Opportunity Commission.

5 My business address is U.S. Equal Employment Opportunity Commission, Las Vegas
6 Local Office, 333 Las Vegas Boulevard South, Ste 5560, Las Vegas, NV 89101.
7

8 On the date that this declaration was executed, as shown below, I served the foregoing
9 **JOINT STIPULATION TO MODIFY THE TERMS OF THE CONSET DECREE** via the
10 Case Management/Electronic Case Filing (CM/ECF) system to:

11
12 Richard I. Dreitzer, Esq.
13 Nevada Bar No. 6626
14 James T. Tucker, Esq.
15 Nevada Bar No. 12507
16 Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
17 300 South Fourth Street, Eleventh Floor
18 Las Vegas, NV 89101
19 (702)727-1400
20 Richard.dreitzer@wilsonelser.com
21 James.tucker@wilsonelser.com

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on March 26, 2019, at Las Vegas, NV.
24
25
26
27
28

/s/ Nechole Garcia
NECHOLE GARCIA