

1 *Law Office of Mary F. Chapman, Ltd.*  
2 *Mary F. Chapman, Esq.*  
3 *Nevada Bar #6591*  
4 *8440 West Lake Mead Blvd.*  
5 *Suite 203*  
6 *Las Vegas, Nevada 89128*  
7 *702-202-4223 Phone*  
8 *702-202-2003 Fax*  
9 *maryf.chapman@juno.com*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 TERI VILLAFANA,  
9 Plaintiff,  
10 vs.  
11 T-Mobile,  
12 Defendant.

Case No. 2:21-cv-00661-GMN-DJA

**STIPULATION AND ORDER**  
**REGARDING TIMELINESS OF**  
**FILING FROM EEOC RIGHT TO SUE**

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15 Plaintiff, Teri Villafana, and Defendant, T-Mobile, by and through respective counsel,  
16 file this Stipulation and Order stipulating in good faith as follows:

17 Plaintiff's claims for race discrimination and retaliation as specifically set forth in her  
18 EEOC Charges of Discrimination (EEOC Nos. 487-2020-01309 and 487-2020-00138 (ECF No.  
19 5 at pp. 6-7) were filed within 90 days of Plaintiff's receipt of the EEOC right to sue notices.

20 This stipulation is based upon Plaintiff's representation that her actual receipt of the  
21 EEOC right to sue notices for the above-referenced Charges was January 29, 2021, and is  
22 further based upon the Nevada Governor's Emergency Directive 009 Section 2 providing tolling  
23 of Nevada state statutes of limitations. The Parties wish to resolve the single issue of Plaintiff's  
24 timely filing of these specific race discrimination and retaliation claims in Federal Court. The  
25 stipulation on this singular fact is without waiving any other defense Defendant may have to any  
26 claims in this matter including but not limited to timeliness of filing the original charges with  
27 the EEOC/NERC, timeliness of any other claims, exhaustion of administrative remedies, or any  
28 other substantive or procedural defenses. The parties submit that this stipulation is made in  
good faith and intended to promote judicial economy.

1 DATED this 31th of August, 2021.

DATED this 31th of August, 2021.

2 LAW OFFICE OF MARY F. CHAPMAN,  
3 LTD.

LITTLER MENDELSON

4 By: /s/ Mary F. Chapman

By: /s/ Amy L. Thompson

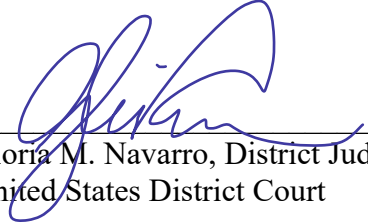
5 Mary F. Chapman, Esq.  
6 8440 W. Lake Mead Blvd.  
Suite 203  
7 Las Vegas, NV 89128  
(702) 202-4223  
8 *Attorneys for Plaintiff*

Amy L. Thompson, Esq.  
Montgomery Y. Paek, Esq.  
3960 Howard Hughes Parkway  
Suite 300  
Las Vegas, Nevada 89169  
(702) 862-7727  
*Attorneys for Defendant*

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13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated this 8 day of September, 2021.

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20 Gloria M. Navarro, District Judge  
United States District Court  
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