

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

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TERI VILLAFANA,

Plaintiff,

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

VS.

T-Mobile.

Defendant

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

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

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

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

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

4 By: /s/ Mary F. Chapman

5 Mary F. Chapman, Esq.
6 8440 W. Lake Mead Blvd.
7 Suite 203
8 Las Vegas, NV 89128
9 (702) 202-4223
10 *Attorneys for Plaintiff*

DATED this 31th of August, 2021.

LITTLER MENDELSON

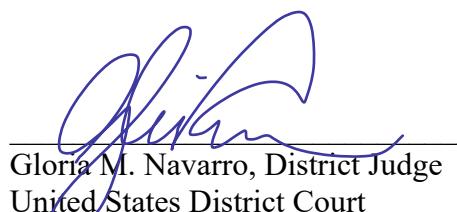
By: /s/ Amy L. Thompson

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

11 **ORDER**

12 **IT IS SO ORDERED.**

13 Dated this 8 day of September, 2021.

14
15
16
17
18
19
20 
Gloria M. Navarro, District Judge
United States District Court