

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

RENT A CENTER EAST INC.,

Defendant.

Case No. 2:16-cv-2222-CSB-EIL

Honorable Judge Colin Stirling Bruce

Magistrate Judge Eric I. Long

REPORT OF RULE 26(F) PLANNING MEETING

Plaintiff U.S. Equal Employment Opportunity Commission and Defendant Rent-A-Center East, Inc., by their attorneys, hereby submit the Parties' Joint Initial Status Report for the Scheduling Conference set before this Court on **September 13, 2016 at 10:45 a.m.**:

1. **Meeting.** Pursuant to Fed. R. Civ. P. 26(f), a telephonic meeting was held on August 15, 2016 and was attended by Justin Mulaire, Michael A. Wilder, and Lavanga V. Wijekoon.

2. **Pretrial Schedule.** The Parties jointly propose to the Court the following discovery plan:

(a) Rule 26(a)(1) Initial Disclosures to be exchanged by **August 31, 2016**;

(b) The deadline to amend pleadings is: **November 14, 2016**;

(c) The deadline to join additional parties is: **November 14, 2016**;

(d) Fact discovery to close by **May 8, 2017**;

(e) **Electronically Stored Information (ESI) Discovery.** The Parties expect to conduct some ESI discovery, pursuant to the Sedona Principles Addressing Electronic Document Production (2d Ed. 2007).

(f) Reports for Retained Experts Under Federal Rule of Civil Procedure 26(a)(2). At this time, the Parties do not expect to conduct expert discovery, but reserve the right to do so after the close of fact discovery, if necessary.

(g) Dispositive Motions. Defendant intends to file a motion for summary judgment on all of Plaintiff's claims. Motions for summary judgment are due 30 days after the close of fact discovery, on **June 7, 2017**, unless expert discovery is warranted, in which case 30 days after the close of expert discovery.

(h) Final Pretrial Order (if applicable). Plaintiff is to send a draft of the Proposed Pretrial Order to Defendant within 60 days after the summary judgment ruling. Parties are to file the Joint Final Pretrial Order 30 days thereafter.

(i) Trial. This case should be ready for trial 60 days after the Joint Final Pretrial Order is filed. The trial is expected to last 3 to 5 days.

3. **Settlement**. The Parties have engaged in preliminary settlement discussions. The Parties do not request a settlement conference at this time, but remain open to considering a settlement conference or mediation after some discovery has been taken.

4. **Consent to Magistrate Judge**. The Parties do not consent unanimously to proceed before a Magistrate Judge.

5. **Pending Motions**. None.

6. **Notice of Subpoenas**. Except as otherwise agreed by the parties, no party shall serve a pre-trial subpoena upon any non-party in connection with this action except after giving five business days' notice (including a copy of the subpoena) to the other party by electronic mail. If, during the five business day period, another party files a motion to quash or modify the subpoena or a motion for a protective order concerning the subpoena (or initiates a telephone

conference with the Court to challenge the subpoena, if the court's procedures so permit), the party serving the subpoena shall refrain from serving the subpoena upon any non-party until after the Court has ruled on the motion.

DATE: August 31, 2016

Respectfully submitted by:

/s/ Justin Mulaire (w/consent)
Attorney for Plaintiff
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/s/ Michael A. Wilder
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CERTIFICATE OF SERVICE

I, **Michael A. Wilder**, an attorney, certify that I served the attorney of record named below with a copy of The Report of Rule 26(f) Planning Meeting via ECF (*Electronic Case Filing*) on August 31, 2016:

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/s/ Michael A. Wilder

Michael A. Wilder