

**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. 16-cv-2222

Judge Bruce

Magistrate Judge Long

**JOINT MOTION TO CONDUCT THREE DEPOSITIONS
AFTER THE COURT'S SUMMARY JUDGMENT RULING**

The parties jointly move to conduct three depositions within 45 days of the Court's Summary Judgment Ruling. In support of this request, the parties state:

- 1) The parties have disclosed Albert Bennett, Frank Piekarski, and Dan Kober as potential witnesses;
- 2) These three witnesses are not relevant for either parties' summary judgment motions, are relatively minor witnesses, and their depositions are estimated to last less than one hour each; and
- 3) The parties agree that these three depositions should be conducted after the Court's Summary Judgment Ruling to avoid burdening these witnesses and potentially the expense involved in taking these depositions.

WHEREFORE, the parties request leave of the Court to conduct the depositions of Albert Bennett, Frank Piekarski, and Dan Kober within 45 days of the Court's Summary Judgment Ruling.

Date: June 27, 2017

Respectfully submitted,

s/ Miles Shultz
U.S. Equal Employment
Opportunity Commission
500 W Madison St. Ste. 2000
Chicago, IL 60661

s/ Stephanie J. Quincy
Counsel to Rent-A-Center
Quarles & Brady LLP
Renaissance One, Two North Central Ave.
Phoenix, AZ 85004
602-229-5200

CERTIFICATE OF SERVICE

I hereby certify that on today's date, I caused the parties' JOINT MOTION TO CONDUCT THREE DEPOSITIONS AFTER THE COURT'S SUMMARY JUDGMENT RULING to be served upon counsel to Defendant via the court's Electronic Case Filing system, pursuant to Local Rule 5.3(A).

June 27, 2017

Respectfully Submitted,

s/ Miles Shultz
U.S. Equal Employment
Opportunity Commission
500 W Madison St. Ste 2000
Chicago, IL 60661