

**IMAI, TADLOCK, KEENEY & CORDERY, LLP**  
**R. RANDY WERTZ**

rrwertz@itkc.com  
220 Montgomery Street, Suite 301  
San Francisco, California 94104  
Telephone: (415) 675-7000  
Facsimile: (415) 675-7008

**YOUNG BASILE HANLON & MACFARLANE, P.C.**

**JEFFREY D. WILSON (PRO HAC VICE)**

wilson@youngbasile.com

**NATASHA R. MENEZES (PRO HAC VICE)**

menezes@youngbasile.com  
3001 W. Big Beaver Road, Suite 624  
Troy, Michigan 48084  
Telephone: (248) 649-3333  
Facsimile: (248) 649-3338

Attorneys for Defendants  
IXL Learning, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

		Case No.: 3:17-cv-02979-VC
U.S. EQUAL EMPLOYMENT OPPORTUNITY		:
COMMISSION,		:
		:
Plaintiff,		:
		:
and		:
		<b>STIPULATION TO EXTEND DISCOVERY</b>
ADRIAN SCOTT DUANE,		:
		:
Plaintiff-Intervenor,		:
		:
v.		:
		:
IXL LEARNING, INC.,		:
		:
Defendant.		:
		:

Pursuant to Civil Local Rule 6-1, 6-2, and 7-12, Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”), Plaintiff-Intervenor Adrian Scott Duane (“Duane”), and Defendant IXL Learning, Inc. (“IXL”), hereby submit the following Stipulation to Extend Discovery. In support of the

1 Stipulation, the Parties submit that good cause exists to permit an extension of the April 13, 2018 fact  
2 discovery deadline to April 17, 2018. [DE 27]. In support of this Stipulation to Extend Discovery, the  
3 declaration of Natasha R. Menezes is attached. The extension of the discovery deadline would only apply  
4 to two depositions and any amendments the parties may have to prior discovery responses that result  
5 directly from any information learned in those depositions. The requested time modification would have  
6 no effect on any of the deadlines of the case. Plaintiff and Plaintiff-Intervenor stipulate to this extension.

7 SO STIPULATED THIS 6th day of April, 2018.

8  
9 **YOUNG BASILE HANLON &  
MACFARLANE, P.C.**

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

10 By:  /s/ Natasha R. Menezes  
11 **Jeffrey D. Wilson (Pro Hac Vice)**  
wilson@youngbasile.com  
12 **Natasha R. Menezes (Pro Hac Vice)**  
13 menezes@youngbasile.com

By:  /s/ Ami Sanghvi (with consent)  
**Ami Sanghvi, SBN 4407672 (NY)**  
ami.sanghvi@eeoc.gov  
**Marcia L. Mitchell, SBN 18122 (WA)**  
marcia.mitchell@eeoc.gov

14 -and-

*Attorneys for Plaintiff U.S. Equal Employment  
Opportunity Commission*

15 **IMAI, RADLOCK, KEENEY & CORDERY,  
LLP**  
16 **R. Randy Wertz**  
17 rrwerts@itkc.com

-and-

**THE MAREK LAW FIRM, INC.**

18 *Attorneys for Defendant IXL Learning, Inc.*

By:  /s/ David Marek (with consent)  
**David Marek, SBN 290686**  
david@marekfirm.com

*Attorneys for Plaintiff-Intervenor Adrian Scott  
Duane*

22  
23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24 Dated: April \_\_, 2018

\_\_\_\_\_  
25 Hon. Vince Chhabria  
26 United States District Court Judge  
27  
28

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on April 6, 2018, the foregoing was caused to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

/s/ Natasha R. Menezes  
Natasha R. Menezes

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28