

1 ROBERTA L. STEELE, SBN 188198 (CA)
2 MARCIA L. MITCHELL, SBN 18122 (WA)
3 AMI SANGHVI, SBN 4407672 (NY)
4 U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
5 San Francisco District Office
6 450 Golden Gate Ave., 5th Floor West
7 P.O. Box 36025
8 San Francisco, CA 94102
9 Telephone No. (415) 522-3071
10 Fax No. (415) 522-3425
11 ami.sanghvi@eeoc.gov

12 *Attorneys for Plaintiff EEOC*

13 DAVID MAREK, SBN
14 THE MAREK LAW FIRM, INC.
15 228 Hamilton Avenue
16 Palo Alto, CA 94301
17 Telephone No. (917) 721-5042
18 david@marekfirm.com

19 *Attorney for Plaintiff-Intervenor Duane*

20 JEFFREY D. WILSON (PRO HAC VICE)
21 NATASHA R. MENEZES (PRO HAC VICE)
22 YOUNG BASILE HANDLON & MACFARLANE, PC
23 3001 W. Big Beaver Road, Suite 624
24 Troy, MI 48084
25 Telephone No. (248) 649-3333
26 wilson@youngbasile.com
27 menezes@youngbasile.com

28 *Attorneys for Defendant IXL Learning, Inc.*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

and

ADRIAN SCOTT DUANE,

Plaintiff Intervenor,

vs.

IXL Learning, Inc.,

Defendant.

Case No.: 3:17-cv-02979-VC

**STIPULATION FOR ADMINISTRATIVE
RELIEF TO EXCEED SUMMARY
JUDGMENT BRIEF PAGE LIMITATION
AND ORDER**

1 Plaintiff U.S. Equal Employment Opportunity Commission (EEOC) and Plaintiff-Intervenor
 2 Adrian Scott Duane filed a Joint Motion for Partial Summary Judgment on July 19, 2018 (ECF 68).
 3 Defendant IXL Learning, Inc. (IXL), opposed Plaintiffs' motion and also filed a Motion for
 4 Summary Judgment on August 2, 2018 (ECF 70-71). Plaintiffs' opposition/reply brief is due on
 5 Thursday, August 16, 2018. This Court's Standing Order for Civil Cases limits the opposition/reply
 6 brief to twenty (20) pages. [Standing Order for Civil Cases before Judge Vince Chhabria at ¶29.]
 7 Plaintiff and Plaintiff-Intervenor require additional space to appropriately address factual assertions
 8 and legal positions in their joint brief. IXL counsel does not oppose an enlargement of five (5)
 9 pages.

10 Thus, pursuant to Rule 7-11 of the Local Rules of the Northern District of California, the
 11 parties request an Order from this Court allowing Plaintiff and Plaintiff-Intervenor to file a twenty-
 12 five (25) page Joint Memorandum of Law in Opposition to Defendant's Motion for Summary
 13 Judgment and Reply in Support of Plaintiffs' Motion for Partial Summary Judgment.

14 Respectfully submitted,

15 Dated: August 13, 2018

EQUAL EMPLOYMENT
 OPPORTUNITY COMMISSION

16 By: /s/ Ami Sanghvi
 17 AMI SANGHVI, Senior Trial Attorney
 18 Attorney for Plaintiff EEOC

19 Dated: August 13, 2018

THE MAREK LAW FIRM

20 By: /s/ David Marek
 21 DAVID MAREK
 22 Attorney for Plaintiff-Intervenor Duane

23 Dated: August 13, 2018

YOUNG BASILE HANDLON & MACFARLANE, PC

24 By: /s/ Jeffrey D. Wilson
 25 JEFFREY D. WILSON
 26 Attorney for Defendant

27
 28 ///

LOCAL RULE 5-1(i)(3) ATTESTATION

I, Ami Sanghvi, am the ECF User whose ID and password are being used to file the Motion for Partial Summary Judgment. In compliance with Local Rule 5-1(i)(3), I hereby attest that David Marek and Jeffrey Wilson concurred in this filing

Dated: August 13, 2018

/s/ Ami Sanghvi
AMI SANGHVI, Senior Trial Attorney

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: August 15, 2018



HON. VINCE R. CHHABRIA
U.S. District Court Judge