

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

EDDIE D. WOODWORTH (PRO HAC VICE)

woodworth@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,	:	Hon. Vince Chhabria
	:	Courtroom: 4, 17 th Floor
Plaintiff,	:	Hearing Date: October 15, 2018
	:	Hearing Time: 10:00 AM
and	:	
	:	
ADRIAN SCOTT DUANE,	:	DEFENDANT’S NOTICE OF MOTION
	:	AND MOTION IN LIMINE NO. 2 RE:
Plaintiff-Intervenor,	:	NOVEL THEORIES OF OPPOSITION
	:	ACTIVITY
v.	:	
	:	
IXL LEARNING, INC.,	:	
	:	
Defendant.	:	

1 **TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:**

2 Please take notice that on October 15, 2018 at 10:00 AM, or as soon thereafter as may be heard in
3 Courtroom 4 of the United States District Court, Northern District of California, Defendant IXL Learning,
4 Inc. (“Defendant”), will and hereby does, move this Court, pursuant to Federal Rule of Evidence 403 and
5 Federal Rule of Civil Procedure 15, hereby submits its Motion *in Limine* to preclude Plaintiffs from
6 expanding the scope of their Complaint to include opposition activity not previously identified and
7 Memorandum of Law in Support.

8 This motion is supported by the Memorandum of Law in Support of Motion *in Limine* filed
9 concurrently herewith, and the pleadings, records and files of the within action, and upon such further
10 evidence and argument as may be submitted at the time of hearing.

11 Respectfully submitted,

12 Dated: September 26, 2018

YOUNG BASILE HANLON & MACFARLANE, P.C.

13 By: /s/ Eddie D. Woodworth

14 **Jeffrey D. Wilson (Pro Hac Vice)**

15 wilson@youngbasile.com

16 **Eddie D. Woodworth (Pro Hac Vice)**

woodworth@youngbasile.com

17 -and-

18 **IMAI, RADLOCK, KEENEY & CORDERY, LLP**

19 **R. Randy Wertz**

20 rrwerts@itkc.com

21 Attorneys for Defendant

22 IXL Learning, Inc.

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

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

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		Case No.: 3:17-cv-02979-VC
U.S. EQUAL EMPLOYMENT OPPORTUNITY	:	Hon. Vince Chhabria
COMMISSION,	:	Courtroom: 4, 17 th Floor
Plaintiff,	:	Hearing Date: October 15, 2018
and	:	Hearing Time: 10:00 AM
ADRIAN SCOTT DUANE,	:	MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANT’S MOTION IN LIMINE NO. 2 RE: NOVEL THEORIES OF OPPOSITION ACTIVITY
Plaintiff-Intervenor,	:	
v.	:	
IXL LEARNING, INC.,	:	
Defendant.	:	

1 **I. INTRODUCTION/BACKGROUND**

2 Now comes Defendant, IXL Learning, Inc., (“IXL”), and for its Motion in Limine to preclude
3 Plaintiffs from expanding the scope of their Complaint to include opposition activity not previously
4 identified, hereby states as follows:

5 The facts of this matter have been well documented throughout the record and will not be restated
6 herein. Importantly for purposes of this motion, on the evening of December 30, 2014, Duane posted an
7 anonymous negative review of IXL titled “Micromanaged and problematic” on Glassdoor.com (the
8 “Post”). Among other accusations unrelated to any employment law claims, Duane alleged there are “no
9 politics if you fit in. If you don’t—that is, if you’re not a family-oriented white or Asian straight or
10 mainstream gay person with 1.7 kids who really likes softball—then you’re likely to find yourself on the
11 outside. Treatment in the workplace, in terms of who gets flexible hours, interesting projects, praise,
12 promotions, and a big yearly raise, is different and seems to run right along these characteristics.” DE 70-
13 1 at 10. The Post does not contain any complaint of gender or disability discrimination or any particular
14 allegation that the writer of the Post was discriminated against based on race, sexual orientation or other
15 characteristics. DE 70-1 at 10 (*citing* Duane Tr. at 71:15-72:24).

16 This Post specifically the references to differential treatment of employees who are not white, Asian,
17 straight, or mainstream gay, is the sole claim of opposition activity engaged in by Duane. Plaintiffs confirmed
18 this as recently as their opening summary judgment brief, in which they reiterated that the only opposition
19 activity at issue in this case pertains to Duane’s Glassdoor.com post. *E.g.*, ECF 68 at 7:5-7 (“[Duane] opposed
20 the discrimination by publicly accusing the company of treating employees disparately based on race, sexual
21 orientation, and gender identity through a negative review on Glassdoor.com”); ECF 68 at 10:19-21 (“Given
22 the benefit of discovery, Duane withdrew his assertion from his federal and state claims that IXL retaliated
23 because he reported discrimination to his manager David Keyes. He retained the claim that IXL retaliated
24 because of the Glassdoor.com post.”) ECF 68 at 11:10 (“IXL fired Duane on January 8, 2015, because of his
25 Glassdoor.com post.”).¹

26 _____
27 ¹ Plaintiffs have consistently taken this position elsewhere in the litigation. In the parties’ Joint Case Management Statement,
28 the parties agreed that the legal issues were (1) “Whether Duane’s Glassdoor.com post is protected activity covered by the
opposition clause of Title VII and ADA’s retaliation provisions” and (2) “Whether Defendant unlawfully retaliated against
Duane.” ECF 23 at 4:20-25. In a filed discovery dispute letter brief, Plaintiffs argued “Plaintiff U.S. Equal Employment
Opportunity Commission and Plaintiff-Intervenor Mr. Duane allege that IXL retaliated against Mr. Duane by terminating his

1 In response to IXL’s summary judgment brief, which challenged whether the Post is opposition activity
2 at all and/or whether Duane had an objectively reasonable belief supporting the Post, Plaintiffs argued for the
3 first time that Duane engaged in *other* opposition activity and that IXL is unfairly ignoring that evidence (again,
4 a theory that had remained unarticulated as recent as Plaintiff’s own summary judgment motion). DE 76 at
5 19:7-10 (“IXL ignores the entirety of Duane’s complaints over time to focus solely on the Glassdoor post, and
6 then argues that Duane did not oppose discrimination because the post did not explicitly mention disability
7 accommodation, discrimination, or sick leave. ***All the discrimination complaints Duane made before and in***
8 ***the post are covered opposition activities.***”) (emphasis added). These additional alleged opposition activities
9 are: (1) requesting to telecommute as an accommodation for a post-operative condition; (2) informing IXL that
10 Duane consulted an attorney to dispute its “denial” of the accommodation; (3) complaining of disability
11 discrimination in a meeting with Keyes; and (4) lodging disability, gender identity, and sexual orientation
12 complaints in a meeting with IXL’s CEO Paul Mishkin. ECF 76 at 19:1-6. This is not the case the Plaintiffs
13 brought, however, nor is it the case that they litigated.

14 II. LEGAL STANDARD/ARGUMENT

15 In order to prevail on a retaliation claim under Title VII and the ADA, Duane must allege and
16 prove that he opposed unlawful discrimination (“opposition activity”). *Moyo v. Gomez*, 32 F.3d 1382,
17 1384 (9th Cir.), amended, 40 F.3d 982 (9th Cir. 1994); *Ray v. Henderson*, 217 F.3d 1234, 1240 (9th Cir.
18 2000). In this case, Plaintiffs’ retaliation claim is alleged as follows:

19 38. IXL retaliated against Duane by terminating him for engaging in legally protected
20 employment activities by publicly posting on a website his opposition to discrimination at
21 IXL in violation of the Title VII and ADA retaliation provisions.

22
23 employment one day after discovering his negative Glassdoor.com post in which Mr. Duane raised discrimination complaints
24 against IXL. IXL admits to terminating Mr. Duane because of his Glassdoor.com post but contends that the post does not
25 constitute protected opposition activity.” ECF 55 at p. 1. In another filed discovery dispute letter brief, Plaintiffs reiterate that
26 “[w]hether Mr. Duane’s December 30, 2014 Glassdoor.com post constituted protected activity under Title VII and the ADA is
27 an element of plaintiffs’ retaliation claims.” ECF 61 at p. 5. In the EEOC’s First Initial Disclosures, the EEOC listed employees
28 who may have knowledge about employee posts on Glassdoor.com, “specifically Mr. Duane’s post giving rise to the instant
action.” Menezes Decl., Ex. CC at 2:9-10. The EEOC objected to a document request on the basis that “[s]earching for
communications that Mr. Duane had about any alleged complaint of discrimination or denial of reasonable accommodation . .
after Mr. Duane’s December 30, 2014 Glassdoor post would not generate information relevant to the claims or defenses in
this matter.” Menezes Decl., Ex. DD at 5:24-27 and 8:8-13 (objecting to a document request on the basis that it “would not
generate information relevant to the claims or defenses in this matter because the communications did not influence [Duane’s]
state of mind when he posted on Glassdoor.com”).

1 ECF 1, ¶ 38.

2 Plaintiffs have never sought to amend their complaint in to allege that IXL terminated Duane for
3 additional acts of opposition activity. Instead, from the filing of their Complaint in May 2017 until their
4 *final* summary judgment brief in August 2018, Plaintiffs maintained at every opportunity that the
5 Glassdoor.com post was the lone source of alleged opposition activity and that this was a narrow case.
6 Attempting to expand that claim from “publicly posting on a website” to “[a]ll the discrimination
7 complaints Duane made before and in the [P]ost are covered opposition activities” is plainly improper,
8 prejudicial and trial by ambush.²

9 “The scope of litigation is framed by the complaint at the time it is filed.” *Los Angeles Branch*
10 *NAACP v. Los Angeles Unified School Dist.*, 750 F.2d 731, 739 (9th Cir. 1984); *Wasco Products, Inc. v.*
11 *Southwall Technologies, Inc.*, 435 F.3d 989, 992 (9th Cir. 2006) (“Simply put, summary judgment is not
12 a procedural second chance to flesh out inadequate pleadings.”). The Ninth Circuit has held that “when
13 the complaint does not include the necessary factual allegations to state a claim, raising such claim in a
14 summary judgment motion is insufficient to present the claim to the district court.” *Navajo Nation v. U.S.*
15 *Forest Serv.*, 535 F.3d 1058, 1080 (9th Cir. 2008). Likewise, in *City of Los Angeles v. Bank of Am. Corp.*,
16 *No. CV 13-9046*, 2015 WL 4880511, at *5 (C.D. Cal. May 11, 2015), *aff’d*, 691 F. App’x 464 (9th Cir.
17 2017), the court condemned plaintiff’s “bait-and-switch litigation tactics” when plaintiff alleged and
18 argued one set of facts and legal theories in its complaint and then abandoned those facts and theories in
19 opposition to the motions for summary judgment.

20 If Plaintiffs are allowed to introduce evidence and argument to the jury that IXL retaliated against
21 Duane for other opposition activities beside the Glassdoor.com Post, it would constitute unfair prejudice
22 to IXL’s right to be apprised of the claims against it. *See also Van Hoomissen v. Xerox Corp.*, 497 F.2d
23 180, 182 (9th Cir. 1974) (In Title VII retaliation case, “district court acted reasonably to confine the scope
24 of trial to that presented by a fair interpretation of the original complaint”); *Accentra Inc. v. Staples,*
25 *Inc.*, 2010 WL 8450890 (C.D.Cal.) (Granting Motion *in limine* to prevent introduction of “new theories”
26

27 ² As discussed in Plaintiff’s Reply Brief in Support of its Motion for Summary Judgment, this newly alleged conduct does not
28 constitute opposition activity. ECF 79, pp. 4-7. The point of this Motion, however, is that this additional conduct cannot be
alleged for the first time at the summary judgment stage and Plaintiff’s should not be allowed to present such evidence at trial
to support opposition activity.

1 that “were never plead in [Plaintiff’s] Complaint (and) not pursued in discovery.”); *Texaco, Inc. v.*
2 *Ponsoldt*, 939 F.2d 794, 798–99 (9th Cir.1991) (holding that adding new claims to complaint two years
3 into litigation and just four and a half months before trial constituted prejudice against the non-moving
4 party, regardless of the argument that the claims were implicit in the previously pleaded claims); *Morongo*
5 *Band of Mission Indians v. Rose*, 893 F.2d 1074, 1079 (9th Cir. 1990) (affirming denial of amendment
6 when “new claims set forth in the amended complaint would have greatly altered the nature of the
7 litigation and would have required defendants to have undertaken, at a late hour, an entirely new course
8 of defense”); FRE 403 (excluding prejudicial evidence).

9 Accordingly, Defendant moves this Court to preclude Plaintiffs from offering evidence or
10 argument that comments or conduct by Duane other than the Glassdoor.com Post constituted opposition
11 activity for the purposes of this retaliation claim.

12 **III. CONCLUSION**

13 Wherefore, Defendant respectfully requests that Plaintiffs should not be permitted to present
14 evidence or argument related to other alleged instances of opposition activity other than Duane’s
15 December 30, 2014 Glassdoor.com Post.

16 Respectfully submitted,

17 Dated: September 26, 2018

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

19 By: /s/ Eddie D. Woodworth

20 **Jeffrey D. Wilson (Pro Hac Vice)**

21 wilson@youngbasile.com

22 **Eddie D. Woodworth (Pro Hac Vice)**

23 woodworth@youngbasile.com

24 -and-

25 **IMAI, RADLOCK, KEENEY & CORDERY, LLP**

26 **R. Randy Wertz**

27 rrwerts@itkc.com

28 Attorneys for Defendant

IXL Learning, Inc.

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 DAMIEN A. LEE, SBN 430135 (WASH. D.C.)
13 Seattle Field Office
14 909 First Ave., Ste. 400
15 Seattle, WA 98104
16 Telephone No. (206) 220-6915
17 Fax No. (206) 220-6911
18 damien.lee@eeoc.gov

19 *Attorneys for Plaintiff EEOC*

20 DAVID MAREK, SBN 290686 (CA)
21 THE MAREK LAW FIRM, INC.
22 228 Hamilton Avenue
23 Palo Alto, CA 94301
24 Telephone No. (917) 721-5042
25 david@marekfirm.com

26 *Attorney for Plaintiff-Intervenor Duane*

27 UNITED STATES DISTRICT COURT
28 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

**PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION *IN LIMINE* NO.
2 RE: NOVEL THEORIES OF
OPPOSITION ACTIVITY**

Pretrial Date: October 15, 2018
Time: 10:00 am
Courtroom: 4, 17th Floor
Judge: Hon. Vince Chhabria

Trial Date: October 22, 2018

1 Plaintiff Equal Employment Opportunity Commission (EEOC) and Plaintiff-Intervenor
 2 Adrian Scott Duane (Duane) file this Opposition to Defendant IXL's Motion *in Limine* No. 2 re
 3 "Novel Theories of Opposition Activity." Less than a week before Defendant served this motion,
 4 this Court rejected Defendant's motion for summary judgment founded on identical arguments, in
 5 part, because there exist genuine factual disputes about whether IXL's decision to fire Mr. Duane
 6 was in retaliation for his complaints about discrimination at the company and yet, here we are
 7 again.¹ [ECF No. 87.]

8 This court should deny Defendant's ill-considered motion *in limine* because: (1) evidence of
 9 all of Mr. Duane's complaints is precisely the evidence the jury is entitled to consider at trial to
 10 determine the reasonableness of his belief that IXL discriminated against him and other IXL
 11 employees under Title VII and the ADA, and IXL's motivation for firing him; and (2) the motion
 12 lacks factual or legal support, and purposefully ignores the record. This court should deny this
 13 motion *in limine* in its entirety and take all other remedial measures that it deems appropriate.

14 **I. ARGUMENT:**

15 **A. Plaintiffs' but-for burden does not preclude evidence of opposition activities that**
 16 **provide context.**

17 Plaintiffs have plead, argued, and presented a consistent case to this Court and Defendant.
 18 Plaintiffs claim that but for Duane's public airing of his discrimination complaints on Glassdoor,
 19 IXL would not have terminated him. Plaintiffs' reliance on evidence and testimony regarding other
 20 incidents that precede the post does not change that claim. Similarly, Plaintiffs reliance on IXL's
 21 knowledge of Duane's amassing opposition activities does not change that claim. Rather, these facts
 22 provide necessary context and cannot be excluded from the jury's consideration. This evidence is
 23 relevant and highly probative of Duane's reasonable belief and IXL's retaliatory animus. The jury is
 24 entitled to review the totality of Mr. Duane's observations, experiences, and conversations with IXL
 25 managers, supervisors, and employees to determine whether he had a reasonable belief that he
 26

27 ¹ Defendant tried to justify the same myopic limitation in support of its unsuccessful motion for
 28 summary judgment in a section of its reply brief entitled, "Plaintiffs Are Not Allowed To Amend
 Their Narrow Retaliation Claim In Response to Defendant's Summary Judgment To Now Include
 Multiple Alleged Opposition Activities." [ECF No. 79, at pp. 7-11.]

1 experienced or witnessed discrimination. This conclusion is firmly grounded in binding Ninth
 2 Circuit precedent. In *EEOC v. Go Daddy Software, Inc.*, the Ninth Circuit found that “looking at all
 3 the circumstances requires us to take note not only of the [opposition activity comments] but also the
 4 context in which they were made.” See *EEOC v. Go Daddy Software, Inc.*, 581 F.3d 951, 964 (9th
 5 Cir. 2009).

6 **B. Defendant cannot claim surprise because Plaintiffs have been alleging the same**
 7 **facts since the inception of the case.**

8 Defendant is recycling its unsuccessful argument that Plaintiffs are advancing new retaliation
 9 theories and attempting to expand their case by introducing opposition activities other than the
 10 December 30, 2014 Glassdoor post. Specifically, Defendant characterizes the following as
 11 “additional” and “newly alleged” opposition conduct: (1) requesting to telecommute as an
 12 accommodation for a post-operative condition; (2) informing IXL that Duane consulted an attorney
 13 to dispute its ‘denial’ of the accommodation; (3) complaining of disability discrimination in a
 14 meeting with Keyes; and (4) lodging disability, gender identity, and sexual orientation complaints in
 15 a meeting with IXL’s CEO Paul Mishkin.” [Def. Motion *in Limine* No. 2, pp. 3-4 (permitting
 16 evidence of four opposition activities constitutes “unfair prejudice to IXL’s right to be apprised of
 17 the claims against it”).] The assertion that these are new allegations ignores both fact and law.
 18 Moreover, evidence relating to these topics does not alter the ultimate question for the jury.²

19 Defendant’s assertion that “Plaintiffs maintained at every opportunity that the Glassdoor.com
 20 post was the *lone* source of alleged opposition activity” is a gross misrepresentation of the record.
 21 Each of the four categories of opposition activity Defendant seeks to preclude has been a part of this
 22 case since its inception. A review of the EEOC’s May 24, 2017 Complaint and Plaintiff-
 23 Intervenor’s December 21, 2017 Complaint shows the following for each allegedly “new” claim:

24
 25 ///

26 ///

27 ² Defendant’s concerns about how the question of liability is presented to the jury are better
 28 addressed through pre-trial filings such as the statement of the case, a customized verdict form, or
 jury instructions, not a motion *in limine*.

Categories of opposition activities that IXL seeks to preclude:	EEOC COMPLAINT (ECF No. 1)	PLAINTIFF-INTERVENOR COMPLAINT (ECF No. 41)
Requesting to telecommute as an accommodation for a post-operative condition	Duane requested a 50% remote work arrangement in order to accommodate his recovery. Duane's manager resisted providing the accommodation and instead suggested that Duane take additional leave until he was able to return. ECF No. 1 at ¶ 25.	Duane requested a 50% remote work arrangement for his first few weeks back at work in order to accommodate his recovery. Duane's manager resisted providing the accommodation and instead suggested that Duane take additional leave until he was able to return. ECF No. 41 at ¶ 22.
Informing IXL that Duane consulted an attorney to dispute its 'denial' of the accommodation ³	Duane informed IXL that he consulted with an employment attorney who advised that remote work requests because of a medical condition qualified as a reasonable accommodation under the Americans with Disabilities Act. ECF No. 1 at ¶26.	Duane informed IXL via email that he had consulted with an employment attorney who advised that remote work requests because of a medical condition qualified as a reasonable accommodation under the Americans with Disabilities Act. ECF No. 41 at ¶23.
Complaining of disability discrimination in a meeting with Keyes	On January 6, 2015, Duane directly reported, in a meeting with his supervisor, his concerns about experiencing discrimination in the workplace. The supervisor promised to alert the CEO about Duane's complaints. ECF No. 1 at ¶31.	On January 6, 2015, Duane directly reported, in a meeting with Keyes, his concerns about experiencing discrimination in the workplace. Keyes promised to alert the CEO about Duane's complaints. ECF No. 41 at ¶ 31.
Lodging disability, gender identity, and sexual orientation complaints in a meeting with IXL's CEO Paul Mishkin	On January 7, 2015, CEO Paul Mishkin emailed Duane to set up a meeting for January 8, 2015 to discuss his discrimination	On January 7, 2015, CEO Mishkin emailed Duane to set up a meeting for January 8, 2015 to discuss his discrimination

³ *And see* Ami Sanghvi response at May 7, 2018 Discovery Hearing before Judge Illman: "the fact that [Mr. Duane] consulted an attorney is one factor of many, many, many factors that show that he had a reasonable good faith belief when he posted on Glassdoor.com on December 30th, 2014." (ECF 67, at p. 9, l. 18-24).

Categories of opposition activities that IXL seeks to preclude:	EEOC COMPLAINT (ECF No. 1)	PLAINTIFF-INTERVENOR COMPLAINT (ECF No. 41)
	complaints. ECF 1 at ¶ 32 On January 8, 2015, Duane met with CEO Mishkin and outlined the concerns he had about discrimination. ECF No. 1 at ¶ 35.	complaints. ECF No. 41 at ¶ 32. On January 8, 2015, Duane met with CEO Mishkin and outlined the concerns he had about discrimination. ECF No. 41 at ¶ 34.

8 Thus, Plaintiffs have consistently claimed that Mr. Duane engaged in several instances of protected
 9 EEO activity leading up to his December 30, 2014 Glassdoor post and subsequent termination.
 10 Plaintiffs have never claimed that the Glassdoor post was Mr. Duane's only opposition to
 11 discrimination. Rather, Plaintiffs contend that absent the post, Mr. Duane would not have been fired.
 12 In other words, the post was the last straw. No facts have been abandoned and no new theories have
 13 been introduced. There has been no bait and switch.

14 The cases Defendant cites to support its argument are inapposite. They are factually
 15 distinguishable because the plaintiffs in those cases never pled the claims in their Complaint. *Van*
 16 *Hoomissen v. Xerox Corp.*, 497 F.2d 180, 182 (9th Cir. 1974)(requested expansion at trial involved
 17 adding the EEOC as an intervening party to bring a discriminatory hiring claim in addition to the
 18 retaliation claim pled by the private plaintiff); *Accentra Inc. v. Staples, Inc.*, No. CV 07-5862 ABC
 19 RZX, 2010 WL 8450890, at *6 (C.D. Cal. Sept. 22, 2010)(granting motion *in limine* for theories
 20 never pled in Accentra's complaint, never provided in five iterations of Accentra's infringement
 21 contentions, and not pursued during discovery); *Texaco, Inc. v. Ponsoldt*, 939 F.2d 794, 798 (9th Cir.
 22 1991) (disallowing addition of breach of the purchase/sale contract, fraud and negligent
 23 misrepresentation claims where new claims introduced the specter of monetary damages and
 24 plaintiff sought amendment after summary judgment); *Morongo Band of Mission Indians v. Rose*,
 25 893 F.2d 1074, 1079 (9th Cir. 1990)(denying amendment after an inordinate delay where new claims
 26 would have greatly altered the nature of the litigation and would have required defendants to
 27 undertake an entirely new defense). In contrast to the cases cited above, Defendant has known about
 28 Plaintiffs allegations since this lawsuit was filed. Defendant's claim in its motion *in limine* that

1 Plaintiffs are somehow unfairly enlarging the scope of Mr. Duane’s protected EEO activity beyond
 2 his December 30, 2014 Glassdoor post is baseless and must be rejected.

3 **C. This Court should reject Defendant’s Motion *In Limine* because it is an attempt**
 4 **to revisit its unsuccessful Motion for Summary Judgment.**

5 In denying Defendant summary judgment, this Court found genuine disputes of material fact
 6 in the record that must be presented to a jury. That record included Mr. Duane’s prior experiences
 7 with and observations of IXL managers, supervisors and employees. The record also included the
 8 opposition activities Defendant now seeks to preclude.

9 **II. CONCLUSION**

10 Given the foregoing, Plaintiffs request this court to deny Defendant’s Motion *in Limine* No. 2
 11 and take all other remedial measures that it deems appropriate.

12
 13 Respectfully submitted,

14 Dated: October 3, 2018

EQUAL EMPLOYMENT
 OPPORTUNITY COMMISSION

15
 16 By: /s/ Ami Sanghvi
 17 AMI SANGHVI, Senior Trial Attorney
 18 Attorney for Plaintiff EEOC

19 Dated: October 3, 2018

THE MAREK LAW FIRM

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

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

24 I, Eddie Woodworth, am the ECF User whose ID and password are being used to file
 25 Plaintiffs’ Opposition to Defendant’s Motion *in limine* No. 2 in accordance with Judge
 26 Chhabria’s Standing Order for Civil Trials. In compliance with Local Rule 5-1(i)(3), I hereby
 27 attest that Ami Sanghvi and David Marek concurred in Defendant filing this brief.

28 Dated: October 4, 2018

/s/ Eddie Woodworth
 EDDIE R. WOODWORTH, Attorney

