

on 5/17/2024 2:29 PM  
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10 *Counsel for Defendant listed on next page*

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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF SANTA CLARA

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15 CALIFORNIA CIVIL RIGHTS  
DEPARTMENT, an agency of the State of  
16 California,  
17 Plaintiff,  
18 v.  
19 CISCO SYSTEMS, INC., a California  
Corporation;,  
20 Defendant.  
21

Case No. 20CV372366  
**JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
PLAINTIFF'S DEADLINE TO FILE  
DEMURRER AND MOTION TO  
STRIKE**

Dept: 16  
Judge: Hon. Amber Rosen

Complaint Filed: October 16, 2020

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7 Attorneys for Defendant  
8 CISCO SYSTEMS, INC.  
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1 IT IS HEREBY STIPULATED by and between Plaintiff California Civil Rights  
2 Department (“Plaintiff”) and Defendant Cisco Systems, Inc. (“Defendant”) (collectively,  
3 “Parties”), through their respective counsel as follows:

4 WHEREAS, on March 18, 2024, Plaintiff filed its Second Amended Complaint;

5 WHEREAS, Defendant served its Answer to Plaintiff’s Second Amended Complaint on  
6 Plaintiff through electronic mail on April 26, 2024;

7 WHEREAS, on April 29, 2024, Plaintiff sent a meet and confer email to Defendant’s  
8 counsel setting forth its general grounds for a motion to strike and/or demurrer to Defendant’s  
9 unverified answer and affirmative defenses;

10 WHEREAS, on May 7, 2024, the Parties, through their respective counsel, participated in  
11 a meaningful telephonic meet and confer process;

12 WHEREAS, on May 14, 2024, the Parties, through their respective counsel, continued  
13 meet and confer efforts, where Defendant agreed to file an amended answer to CRD’s Second  
14 Amended Complaint;

15 WHEREAS, the Parties agreed to extend Plaintiff’s time to file a motion to strike and/or  
16 demurrer to Defendant’s Answer to the Second Amended Complaint pending the filing of an  
17 amended answer.

18 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

- 19 1. Plaintiff’s current deadline to file a motion to strike/demurrer to Defendant’s Answer  
20 to the Second Amended Complaint is extended to May 31, 2024;
- 21 2. Defendant shall have until May 29, 2024 to file an amended answer to CRD’s Second  
22 Amended Complaint;
- 23 3. Plaintiff will have ten days from the filing of an amended answer by Defendant to file  
24 and serve a motion to strike and/or demurrer, if necessary; and
- 25 4. Should the Court deny the Stipulation to allow Defendant to file an amended answer,  
26 the Parties agree that Plaintiff’s request for an extension of time to file a demurrer be  
27 extended to the agreed upon date, May 31, 2024, should be granted.

28 Respectfully submitted,

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Dated: May 16, 2024

CALIFORNIA CIVIL RIGHTS DEPARTMENT

By: /s/ Rumduol Vuong

Rumduol Vuong

Attorney for CIVIL RIGHTS DEPARTMENT

Dated: May 16, 2024

CISCO SYSTEMS, INC.

By: /s/ Nicholas Horton

Nicholas Horton

Attorney for CISCO SYSTEMS, INC

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**[PROPOSED] ORDER**

Good cause having been shown, the Court hereby ORDERS pursuant to the Parties' stipulation that:

1. Plaintiff's current deadline to file a motion to strike/demurrer to Defendant's Answer to the Second Amended Complaint is extended to May 31, 2024, including where the Court denies the Stipulation to allow Defendant to file an amended answer;
2. Defendant shall have until May 29, 2024 to file an amended answer to CRD's Second Amended Complaint; and
3. Plaintiff will have ten days from the filing of an amended answer by Defendant to file and serve a motion to strike and/or demurrer, if necessary.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Amber Rosen  
Judge of the Santa Clara County Superior Court

1 **PROOF OF SERVICE**

2 I, Carolina Arana, the undersigned, hereby declare:

3 I am over eighteen years of age and not a party to the within cause. My business address  
4 is 555 12<sup>th</sup> Street, Suite 2050, Oakland, CA 94607. My electronic service address is  
5 Carolina.Arana@calcivilrights.ca.gov.

6 On the date below, I served the following document(s) via Electronic Service:


- 7 • **JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING  
8 PLAINTIFF’S DEADLINE TO FILE DEMURRER AND MOTION TO  
9 STRIKE**

9 in the case *CRD v. Cisco Systems, Inc. et al.*, Santa Clara County Superior Court Case No.:  
10 20CV372366, to the person(s) listed below at the following amended e-mail address(es):

<p>11 Lynne C. Hermle 12 <a href="mailto:lchermle@orrick.com">lchermle@orrick.com</a> 13 Joseph C. Liburt 14 <a href="mailto:jliburt@orrick.com">jliburt@orrick.com</a> 15 Nicholas J. Horton <a href="mailto:nhorton@orrick.com">nhorton@orrick.com</a> Attorneys for Defendant Cisco Systems, Inc.</p>	
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16 I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct.

18 Executed on **May 17, 2024**, at Oakland, CA.

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22 Carolina Arana, Legal Secretary  
23 CA Civil Rights Department (formerly DFEH)  
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