

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

The Honorable Edward F. Shea

Thomas D. Adams
Celeste Mountain Monroe
KARR TUTTLE CAMPBELL
1201 Third Avenue, Suite 2900
Seattle, Washington 98101-3028
(206) 223-1313
Attorneys for North Central Regional Library District

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

SARAH BRADBURN, PEARL)	
CHERRINGTON, CHARLES)	
HEINLEN, and THE SECOND)	NO. CV-06-327-EFS
AMENDMENT FOUNDATION,)	
)	JOINT MOTION FOR EXPEDITED
Plaintiffs,)	HEARING
)	
v.)	
)	
NORTH CENTRAL REGIONAL)	
LIBRARY DISTRICT,)	
)	
Defendant.)	
)	

The parties move the Court to grant their Joint Motion for Expedited Hearing. The parties further request that the Court hear their Motion to Amend

JOINT MOTION FOR EXPEDITED

HEARING - 1
CV-06-327-EFS
#642220 v1 / 42703-001

Law Offices
KARR TUTTLE CAMPBELL
A Professional Service Corporation
1201 Third Avenue, Suite 2900, Seattle, Washington 98101-3028
Telephone (206) 223-1313, Facsimile (206) 682-7100

1 the Case Scheduling Order on September 14, 2007 without oral argument. Good
2 cause exists for this request.
3

4 On February 27, 2007, the Court entered a scheduling order in the above-
5 captioned case following a telephonic status conference with counsel. The
6 parties stipulated to a modification of the case schedule and acted in reliance
7 upon it. This stipulation was filed on June 28, 2007, however, it was never
8 entered by the Court.
9
10

11 Under the operative case scheduling order entered in February 2007, the
12 discovery cut off is Friday, September 14, 2007. By its motion to Amend the
13 Case Scheduling Order, the parties request the Court extend the discovery cut
14 off, and other critical dates primarily to allow for the completion of expert
15 discovery. For this reason, the parties respectfully request that the Court grant
16 their motion for expedited hearing and that it rule on their Motion to Amend the
17 Case Schedule on Friday, September 14, 2007.
18
19
20

21 NCRL has confirmed that Plaintiffs' counsel has no objection to this
22 Motion for Expedited Hearing. Similarly, Plaintiffs' counsel has stipulated to
23 the dates contained in the Motion to Amend the Case Scheduling Order.
24
25
26
27
28

JOINT MOTION FOR EXPEDITED

HEARING - 2

CV-06-327-EFS
#642220 v1 / 42703-001

Law Offices
KARR TUTTLE CAMPBELL
A Professional Service Corporation
1201 Third Avenue, Suite 2900, Seattle, Washington 98101-3028
Telephone (206) 223-1313, Facsimile (206) 682-7100

1 DATED this 13th day of September, 2007.

2 KARR TUTTLE CAMPBELL


3
4
5 /s/ Thomas D. Adams
6 Thomas D. Adams, WSBA #18470
7 E-mail: tadams@karrtuttle.com
8 Celeste M. Monroe, WSBA #35843
9 E-mail: cmonroe@karrtuttle.com
10 Attorney for Defendant North Central
11 Regional Library District
12 KARR TUTTLE CAMPBELL
13 1201 Third Avenue, Suite 2900
14 Seattle, Washington 98101
15 Telephone: 206.223.1313
16 Facsimile: 206.682.7100

17
18
19
20
21
22
23
24
25
26
27
28
CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

Duncan Manville
Rafel Manville PLLC
999 Third Ave., Ste. 1600
Seattle, WA 98104

KARR TUTTLE CAMPBELL

By: 
Heather L. White
hwhite@karrtuttle.com

JOINT MOTION FOR EXPEDITED

HEARING - 3

CV-06-327-EFS
#642220 v1 / 42703-001

Law Offices
KARR TUTTLE CAMPBELL

A Professional Service Corporation

1201 Third Avenue, Suite 2900, Seattle, Washington 98101-3028
Telephone (206) 223-1313, Facsimile (206) 682-7100