

**THE HONORABLE JOHN C. COUGHENOUR**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JAMES S. GORDON, Jr., a married individual, d/b/a 'GORDONWORKS.COM'; OMNI INNOVATIONS, LLC., a Washington limited liability company;

Plaintiffs,

v.

VIRTUMUNDO, INC, a Delaware corporation d/b/a ADKNOWLEDGEMAIL.COM; ADKNOWLEDGE, INC., a Delaware corporation, d/b/a ADKNOWLEDGEMAIL.COM; SCOTT LYNN, an individual; and JOHN DOES, 1-X,

Defendants.

No. CV06-0204JCC

STIPULATION AND [PROPOSED] ORDER MODIFYING DISCOVERY CUTOFF AND OTHER DATES

**STIPULATION**

WHEREAS, pursuant to Fed. R. Civ. P. 16(f), the last court day to complete discovery and file and serve motions to compel discovery is December 15, 2006.

1 WHEREAS, pursuant to the Court's June 13, 2006 order (Dkt. #27), the dispositive  
2 motions filing deadline is December 22, 2006.

3 WHEREAS, the parties have met and conferred in good faith regarding scheduling  
4 depositions in this case. As a result of the holiday season and the diverse locations of the  
5 deponents, the parties have been unable to find mutually convenient dates to conduct  
6 depositions of fact witnesses in this case on or prior to December 15, 2006.  
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8 WHEREAS, the parties respectfully request that the Court modify the June 13, 2006  
9 scheduling order (Dkt. #27) to extend certain dates as follows:


- 10 • Extend the deadline for the parties to depose fact witnesses thirty (30) days to  
11 January 15, 2006; and
- 12 • Extend the general dispositive motions filing deadline provided in Dkt. #27  
13 thirty (30) days to January 22, 2006.  
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15 WHEREAS, the parties agree that all other dates, including the court-ordered deadline  
16 for Plaintiffs' motion for summary judgment (*see* Dkt. #46), shall remain unmodified.

17 DATED this 20th day of November, 2006.

18 NEWMAN & NEWMAN, LLP  
19 Attorneys for Defendants

MERKLE SIEGEL & FRIEDRICHSEN, P.C.  
Attorneys for Plaintiffs

20  
21   
By \_\_\_\_\_  
22 Derek A. Newman, WSBA # 26967  
23 Roger M. Townsend, WSBA # 25525

/s/ Robert Siegel with authorization  
By \_\_\_\_\_  
24 Robert J. Siegel WSBA# 17312

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**ORDER**

Pursuant to stipulation of counsel, it is hereby ORDERED, as follows:

1. The deadline for the parties to depose fact witnesses is extended thirty (30) days to January 15, 2006;

2. The general motions filing deadline provided in Dkt. #27 is extended thirty (30) days to January 22, 2006.

All other dates and schedules, including but not limited to those set forth in the Court's Minute Order (Dkt. #46), shall remain unmodified.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
THE HONORABLE JOHN C. COUGHENOUR  
UNITED STATES DISTRICT JUDGE