

**THE HONORABLE JOHN C. COUGHENOUR**

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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 CUTOFF FOR DISCOVERY MOTIONS

**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, the parties have met and conferred pursuant to Fed. R. Civ. P. 37  
2 regarding Defendants' allegations that Plaintiffs have (i) failed to respond in full to "Defendant  
3 Scott Lynn's First Set Of Interrogatories And Requests For Production Of Documents To  
4 Plaintiffs Omni Innovations, LLC., and Plaintiff Gordon" (the "Lynn Requests"); and (ii) that  
5 Plaintiffs' prior production of documents, specifically the emails at issue in this lawsuit, is  
6 deficient.  
7


8 WHEREAS, the parties have agreed to extend the time for Plaintiffs to respond to the  
9 Lynn Requests to Wednesday, December 20, 2006 at 5:00 pm.

10 WHEREAS, the parties have agreed to extend by one (1) week to December 22, 2006  
11 Defendants' deadline for filing discovery motions for relief related to (i) Plaintiffs' responses,  
12 or lack thereof, to the Lynn Requests; and (ii) the form and contents of Plaintiffs' prior  
13 production of documents.  
14

15 DATED this 15<sup>th</sup> day of December, 2006.

16 NEWMAN & NEWMAN, LLP  
17 Attorneys for Defendants

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

18   
19 By \_\_\_\_\_  
20 Derek A. Newman, WSBA # 26967  
Roger M. Townsend, WSBA # 25525

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

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**ORDER**

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

1. Plaintiffs’ deadline for providing its discovery responses is extended five (5) calendar days to December 20, 2006 at 5:00 p.m.

2. Defendants’ deadline for filing discovery motions related to the Lynn Requests, and Plaintiffs’ prior document production of the emails in this lawsuit is extended seven (7) calendar days to December 22, 2006;

All other dates and schedules shall remain unmodified.

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

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