

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 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.
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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 15th day of December, 2006.

16 NEWMAN & NEWMAN, LLP
17 Attorneys for Defendants

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

18 Roger Townsend

/s/ Robert Siegel with authorization

19 By _____
20 Derek A. Newman, WSBA # 26967
Roger M. Townsend, WSBA # 25525

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 19th day of December, 2006.



THE HONORABLE JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE