

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CAROLYN ANDERSON,

Plaintiff,

v.

DOMINO'S PIZZA, INC., DOMINO'S PIZZA, LLC,
FOUR OUR FAMILIES, INC., and CALL-EM-ALL,
LLC,

Defendants.

NO. C11-902RBL

DEFENDANT FOUR OUR FAMILIES, INC.'S
NOTICE OF JOINDER IN DOMINO'S PIZZA'S
RESPONSE TO PLAINTIFF'S MOTION FOR
RELIEF WASH. LOCAL RULE 7(d)(2)(A)

NOTED ON MOTION CALENDAR:
March 23, 2012

I. INTRODUCTION

COMES NOW, the DEFENDANT, FOUR OUR FAMILIES, INC. ("FOFI") who respectfully joins Domino's Pizza, Inc. and Domino's Pizza, LLC. (collectively "Domino's") in its Response to Plaintiff's Motion [dkt.no.69] and adopts all arguments and evidence presented by Domino's. In addition, Defendant FOFI respectfully requests the Court require Plaintiff to respond to FOFI's Motion for Summary Judgment, noted for March 30, 2012, as scheduled. [dkt. 73].

II. RELIEF REQUESTED

FOFI's summary judgment motion addresses completely different legal issues than that of Domino's pending summary judgment motion. Therefore, the continuance request by Plaintiff should have no bearing. FOFI has complied with all discovery requests made

1 by Plaintiff. There would be no prejudice to Plaintiff in responding to FOFI's motion.
2 Plaintiff's counsel has prepared and filed a summary judgment response with the same
3 exact legal issues as in *Cabbage v. Talbots*.

4 III. CONCLUSION

5 Defendant FOFI requests that its Motion for Summary Judgment noted for March 30,
6 2012, be unaffected by Plaintiff's pending motions. She has not indicated any reason
7 that FOFI's motion would also need to be continued. Plaintiff has had ample opportunity
8 and time to furnish a response to FOFI's summary judgment motion.
9

10
11 Dated this 21st day of March, 2012.

12 /s Nelson C. Fraley, II
13 Nelson C. Fraley, II, WSBA No. 26742
14 Attorneys for Plaintiff
15 FAUBION REEDER FRALEY & COOK, PS
16 5920 100th Street SW, Suite 25
17 Lakewood, WA 98499
18 Telephone: (253) 581-0660
19 Fax: (253) 581-0894
20 Email: nfraley@fjr-law.com
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2012, 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 following:

Kim Williams
Rob Williamson
Williamson & Williams
187 Parfitt Way SW, Suite 250
Bainbridge Island, WA 98110
Attorneys for Plaintiff

David M. Soderland
Dunlap & Soderland, P.S.
901 Fifth Avenue, Suite 3003
Seattle, WA 98164
Attorneys for Domino's Pizza

Kelly P. Corr
Corr Cronin Michelson, et al.
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154
Attorneys for Call-Em-All, LLC

Andrew B. Lustigman
Scott Shaffer
Olshan Grundman Frome
Rosenzweig & Wolosky, LLP
Park Avenue Tower
65 East 55th Street
New York, NY 10022
Pro Hac Vice Attorneys for Call-Em-All, LLC

s/ Lona Hertz
Faubion Reeder Fraley & Cook, PS
5920 100th Street SW, Suite 25
Lakewood, WA 98499
Telephone: (253) 581-0660
Fax: (253) 581-0894
Email: lhertz@fjr-law.com