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THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
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, INC.,

Defendants.

NO. C11-902 RBL

REPLY OF PLAINTIFF TO
RESPONSES OF DEFENDANTS
DOMINO'S PIZZA INC., DOMINO'S
PIZZA, LLC, AND FOUR OUR
FAMILIES, INC. TO PLAINTIFF'S
MOTION TO BE RELIEVED OF
DEADLINE UNDER W.D. WASH.
LOCAL RULE 7(d)(2)(A)

NOTED ON MOTION CALENDAR:
March 23, 2012

Defendants Domino's Pizza Inc. and Domino's Pizza, LLC ("Domino's") do not oppose the Plaintiff's Motion, but do urge that the additional time that should be granted to Plaintiff to respond to their Summary Judgment Motion should be limited to 45 days. Defendant Four Our Families, Inc. ("FOFI"), appears not to oppose the motion, either, but expresses concerns that its pending Motion for Summary Judgment (Dkt.#73) should not be delayed.

Plaintiff submits that her request for 90 days is reasonable under the circumstances. The Court has not yet ruled on the pending Motion for Protective order (Dkt.#45) of Domino's, and the discovery that may be produced if the Court denies some or all of the Motion must then be produced, evaluated and incorporated into any further briefing on the Domino's Summary

REPLY OF PLAINTIFF TO RESPONSES OF DEFENDANTS
DOMINO'S PIZZA INC., DOMINO'S PIZZA, LLC, AND FOUR O
UR FAMILIES, INC. TO PLAINTIFF'S MOTION TO BE
RELIEVED OF DEADLINE UNDER W.D. WASH. LOCAL RULE 7(d)(2)(A)
(Case No. NO. C11-902 RBL)

WILLIAMSON & WILLIAMS
17253 AGATE STREET NE
BAINBRIDGE ISLAND, WA 98110
(206) 780-4447
(206) 780-5557 (FAX)
www.williamslaw.com

1 Judgment Motion. Further, Plaintiff has filed a Motion to Compel (Dkt.#77) FRCP 30(b)(6)
2 witnesses that she believes should be produced by Domino's. At this date, that motion is not yet
3 fully briefed.
4

5 Plaintiff has no intent of delaying the Summary Judgment Motion of FOFI, and will file
6 her opposition on Monday, March 26, 2012, when it is due.

7 Plaintiff respectfully requests that the Court extend the time for her to oppose the
8 Domino's Summary Judgment Motion for the 90 days originally requested.
9

10 DATED: March 23, 2012.

11 WILLIAMSON & WILLIAMS
12 /s/ Rob Williamson
13 Rob Williamson, WSBA #11387
14 Kim Williams, WSBA #9077
15 WILLIAMSON & WILLIAMS
16 17253 Agate Street NE
17 Bainbridge Island, WA 98110
18 Telephone: (206) 780-4447
19 FAX: (206) 780-5557
20 roblin@williamslaw.com
21 kim@williamslaw.com
22 Attorneys for Plaintiff
23
24
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1 CERTIFICATE OF SERVICE

2 I hereby certify that on March 23, 2012, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing
4 to all counsel of record who receive CM/ECF notification, and that the remaining parties shall be
5 served in accordance with the Federal Rules of Civil Procedure.
6

7 Dated this 23rd day of March, 2012.

8 By /s/Rob Williamson
9 Rob Williamson, WSBA #11387
10 WILLIAMSON & WILLIAMS
11 17253 Agate Street NE
12 Bainbridge Island, WA 98110
13 Telephone: (206) 780-4447
14 Fax: (206) 780-5557
15 Email: roblin@williamslaw.com
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