1	The Honorable Barbara J. Rothstein		
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8	UNITED STATES DISTRICT COURT		
9	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
10	TRADER JOE'S COMPANY, a		
11	California Corporation,	No. 2:13-cv-00768-BJR	
12	Plaintiff,	STIPULATED MOTION AND ORDER GRANTING LEAVE FOR	
13	v.	TRADER JOE'S TO FILE SECOND AMENDED COMPLAINT	
14	MICHAEL NORMAN HALLATT, an individual, d/b/a PIRATE JOE'S a/k/a	NOTE ON MOTION CALENDAR:	
15	TRANSILVANIA TRADING; and DOES 1-10,	March 27, 2017	
16	Defendants.		
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18	STIPULATEI	OMOTION	
19	Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and LCR 15,		
20	Plaintiff Trader Joe's Company ("Trader Joe's") and Defendant Michael Hallatt ("Mr.		
21	Hallatt") jointly stipulate as follows:		
22	WHEREAS, on December 20, 2016, the Court issued an order setting March 28,		
23	2017 as the deadline for amended pleadings (ECF No. 58);		
24	WHEREAS, the parties have agreed that, subject to the Court's approval, Trader		
25	Joe's may file its Proposed Second Amended Complaint, a redlined copy of which is		
26	attached as Exhibit A to this stipulation;		

1	NOW, THEREFORE, with the Court's permission and approval, the parties hereby		
2	stipulate and respectfully request that the Court grant Trader Joe's leave to file its Second		
3	Amended Complaint, as reflected in Exhibit A to this stipulation.		
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5	Dated: March 27, 2017.	YARMUTH WILSDON PLLC	
6		By /s/ Jeremy E. Roller	
7		Scott T. Wilsdon, WSBA No. 20608 Jeremy E. Roller, WSBA No. 32021	
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9		Telephone: 206.516.3800 Facsimile: 206.516.3888	
10		<u>jroller@yarmuth.com</u> wilsdon@yarmuth.com	
11		······································	
12		O'MELVENY & MYERS LLP	
13		Brian M. Berliner, (pro hac vice) Jordan Raphael, (pro hac vice)	
14		Tim Byron (<i>pro hac vice</i>) 400 South Hope Street	
15		Los Angeles, CA 90071-2899 Telephone: 213.430.6000	
16		Facsimile: 213.430.6407 bberliner@omm.com	
17		jraphael@omm.com	
		tbyron@omm.com	
18		Attorneys for Plaintiff Trader Joe's Company	
19	Dated: March 27, 2017.	DORSEY & WHITNEY LLP	
20		/s/ Nathan Alexander Nathan Alexander, WSBA No. 37040	
21		Michael Keyes, WSBA No. 29215 Andrea Yang, WSBA No. 50613	
22		701 Fifth Avenue, Suite 6100	
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24		Facsimile: 206.903.8820 <u>alexander.nathan@dorsey.com</u>	
25		keyes.mike@dorsey.com yang.andrea@dorsey.com	
26		Attorneys for Defendants	

1	OR	DER
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3	IT IS SO ORDERED.	
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5	Dated: April 3, 2017	
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8		Barbara Lothetein
9		Barbara Jacobs Rothstein
10		U.S. District Court Judge
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1	CERTIFICATE OF SERVICE	
2	I hereby certify that on this date I electronically filed the foregoing with the Clerk of	
3	the Court using the CM/ECF system, which will send notification of such filing to the	
4	following counsel of record:	
5	Nathan T. Alexander (alexander.nathan@dorsey.com)	
6	Michael Keyes (keyes.mike@dorsey.com) Andrea Yang (yang.andrea@dorsey.com)	
7	DORSEY & WHITNEY LLP	
8	Attorneys for Defendant Michael Norman Hallatt	
9	Dated: March 27, 2017 at Seattle, Washington.	
10		
11	<u>s/Jeremy E. Roller</u> Jeremy E. Roller	
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