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THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRENDA JOYCE LITTLE, a single female,

Plaintiff,

v.

WASHINGTON STATE, JOANNE ABLESON & JOHNSON DOE ABLESON, individually capacity; JULIE SHANKLAND & JOHN DOE SHANKLAND, individual capacity; KENNETH BURTON & JANE DOE BURTON, individual, CRAIG BELES & JANE DOE BELES, individual; HARISH BHARTI & JANE DOE BHARTI, individual; HENRY RICHARDS, PH.D. & JANE DOE RICHARDS, individual; KENNETH MUSCATEL, PH.D. & JANE DOE MUSCATEL, individual; WASHINGTON STATE BAR ASSOCIATION BOARD OF GOVERNORS, individual & official capacity,

Defendants.

No. 2:13-cv-01284 RSL

STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES

**NOTE ON MOTION CALENDAR:
SEPTEMBER 11, 2013**

STIPULATION

The parties herein, appearing pro se and through their respective counsel, have agreed to present the following stipulated motion to the Court pertaining to the initial scheduling dates set by the Court in the Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, dated July 23, 2013 (ECF Doc. No. 5).

STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES - 1
NO. 2:13-CV-01284

LAW OFFICES OF
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1 **MOTION**

2 **A. Relief Requested**

3 The parties move the Court for an Order striking all deadlines in the Court's Order of
4 July 23, 2013 (ECF Doc. No. 5), and staying all discovery, and further request that the Court
5 issue a new set of deadlines for a Rule 26(f) conference, initial disclosures, and joint status
6 report and discovery plan after the Court rules on the motions now pending before the Court in
7 this matter.

8 **B. Facts**

9 The following motions are currently pending before the Court:

- 10 1. Plaintiff's Motion for Declaratory Judgment (ECF Doc. No. 12).
- 11 2. Defendant State of Washington's Motion to Dismiss (ECF Doc. No. 16).
- 12 3. WSBA Defendants' Motion to Dismiss (ECF Doc. No. 17).
- 13 4. WSBA Governors' Motion to Stay Plaintiff's Motion for Declaratory Judgment
14 (ECF Doc. No. 18).
- 15 5. WSBA Defendants' Motion for Imposition of Bar Order (ECF Doc. No. 19).
- 16 6. Defendant State of Washington's Motion for Imposition of Bar Order (ECF
17 Doc. No. 22).
- 18 7. Plaintiff's Motion for Sanctions (ECF Doc. No. 23).
- 19 8. Defendants Muscatel and Richards' Motion to Dismiss (ECF Doc. No. 24).
- 20 9. Defendants Muscatel and Richards' Joinder in WSBA Governors' Motion to
21 Stay Plaintiff's Motion for Declaratory Judgment (ECF Doc. No. 25).
- 22 10. Defendants Muscatel and Richards' Joinder in WSBA's Motion for Imposition
23 of Bar Order (ECF Doc. No. 26).

24 Several of these motions are dispositive and, if granted, may render further proceedings
25 regarding discovery or reporting unnecessary.

1 **C. Argument**

2 Depending on the Court's rulings on the pending motions, some or all further
3 proceedings in this matter may not be necessary. Planning efforts concerning discovery and a
4 joint status report would be wasted if any of the dispositive motions are granted. Therefore,
5 the parties request the Court to strike the deadlines in the Court's July 23, 2013 Order, stay all
6 discovery, and first consider and decide the pending motions, and thereafter issue a new set of
7 deadlines if necessary. This request will result in the most efficient manner to proceed in this
8 case, conserving the Court's and the parties' time and resources.

9 This motion is brought under LCR 7(d)(1) and 10(g).

10 RESPECTFULLY SUBMITTED this 11th day of September, 2013.

11 COZEN O'CONNOR

12
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STIPULATED MOTION TO EXTEND INITIAL SCHEDULING
DATES - 3
NO. 2:13-CV-01284

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STIPULATED MOTION TO EXTEND INITIAL SCHEDULING
DATES - 4
NO. 2:13-CV-01284

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/ORDER

IT IS SO ORDERED. If necessary, the Court will issue a new set of initial scheduling dates following disposition of the currently pending motions.

Dated this 12th day of September, 2013.


HONORABLE ROBERT S. LASNIK
United States District Judge