1 2 3 Hon. Marsha J. Pechman 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 JOHN R. BUND II, personally, as Executor of 8 the Estate of Richard C. Bund, deceased, S. SCOTT JAMES and NOEL L. JAMES, a No. 2:16-cv-920 MJP 9 married couple, and on behalf of others similarly situated, STIPULATED MOTION TO CHANGE 10 RESPONSE DEADLINE Plaintiffs. 11 (CLERK'S ACTION REQUIRED.) VS. 12 **NOTED FOR MOTION:** SAFEGUARD PROPERTIES, LLC, a **APRIL 18, 2018** 13 Delaware corporation, 14 Defendant. 15 I. STIPULATION 16 On February 16, 2018, the Court entered an order setting trial date, and setting the 17 deadline to file dispositive cross-motions at April 6, 2018, with a deadline to respond on April 30, 18 2018. Dkt. # 220. The order states no replies will be filed. *Id*. 19 During a telephonic hearing on March 27, 2018, the Court granted additional time to file 20 the cross-motions so the parties could address discovery issues. Dkt. # 225. However, the new 21 order did not also change the response deadline stated in the order setting trial date. Dkt. # 220. 22 Because Dkt. # 220 contains the usual language requiring leave of court to change deadlines in 23 the order, the parties jointly request the Court to change the response deadline from April 30, 24 2018, to May 18, 2018. LCR 7(d)(1); 10(g). 25 STIPULATED MOTION TO CHANGE RESPONSE **DEADLINE - 1** 2:16-cv-920 MJP

1 2 3 4 5 6	Because the deadline for motions was e under the local rules would be severely truncated good cause exists to extend the deadline for the DATED this 18th day of April, 2018.	-
7		
8	Ву	: <u>/s/ Clay M. Gatens</u> Clay M. Gatens, WSBA No. 34102
9		Sally F. White, WSBA No. 49457
10		Devon A. Gray, WSBA No. 51485 Of Attorneys for Plaintiffs
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15		SallyW@jdsalaw.com DevonG@jdsalaw.com
16 17	DATED this 18th day of April, 2018.	
18		DAUDT LAW PLLC
19	Ву	: <u>/s/ Michael D. Daudt</u> Mr. Michael D. Daudt, WSBA # 25690
20		Associated Counsel for Plaintiff
21		Daudt Law PLLC 2200 Sixth Avenue, Suite 1250
22		Seattle, WA 98121-1820 (206) 445-7733
23		mike@daudtlaw.com
24		
25	DATED this 18th day of April, 2018.	
	STIPULATED MOTION TO CHANGE RESPONSE DEADLINE - 2	

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2	TERRELL MARSHALL LAW GROUP PLLC
3	
4	By:/s/ Blythe H. Chandler
5	Beth E. Terrell, WSBA No. 26759 Blythe H. Chandler, WSBA No. 43387
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9	bterrell@terrellmarshall.com bchandler@terrellmarshall.com
10	DATED this 18th day of April, 2018.
11	LEE SMART, P.S., INC.
12	
13	By:/s/ Pamela J. DeVet
14	Pamela J. DeVet, WSBA No. 32882 Kellan W. Byrne, WSBA No. 49825
15	Of Attorneys for Defendant
16	Safeguard Properties Management, LLC Lee Smart, P.S., Inc.
	701 Pike Street, Suite 1800
17	Seattle, WA 98101 (206) 624-7990
18	pjd@leesmart.com
19	kwb@leesmart.com
20	DATED this 18th day of April, 2018.
21	KIRKLAND & ELLIS LLP
22	KIKKLAND & ELLIS LLF
23	
24	By:/ <u>s/ Leonid Feller</u> Leonid Feller, Illinois Bar Number 6274905
25	Admitted <i>pro hac vice</i> Of Attorneys for Defendant
	STIPLILATED MOTION TO CHANGE RESPONSE

STIPULATED MOTION TO CHANGE RESPONSE DEADLINE - 3 2:16-cv-920 MJP

STIPULATED MOTION TO CHANGE RESPONSE DEADLINE - 4 2:16-cv-920 MJP

1	II. ORDER		
2	It is so ordered.		
3	Dated this _19th day of	April, 2018.	
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5			Marshy Melens
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7			The Honorable Marsha J. Pechman United States Senior District Court Judge
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1 CERTIFICATE OF SERVICE I hereby certify that on the date provided at the signature below, I electronically filed the 2 preceding document with the Clerk of the Court using the CM/ECF system, which will send 3 notification of such filing to the following individuals: 4 5 Mr. Clay Gatens Ms. Devon A. Gray 6 Jeffers, Danielson, Sonn & Aylward, P.S. 2600 Chester Kimm Road 7 Wenatchee, WA 98801-811 clayg@jdsalaw.com 8 DevonG@idsalaw.com 9 Mr. Michael D. Daudt 10 DAUDT LAW PLLC 2200 Sixth Avenue, Suite 1250 11 Seattle, Washington 98121 12 mike@daudtlaw.com 13 Ms. Beth E. Terrell Ms. Blythe H. Chandler 14 Terrell Marshall Law Group PLLC 936 N. 34th Street, Suite 300 15 Seattle, WA 98103-8869 16 bterrell@terrellmarshall.com bchandler@terrellmarshall.com 17 I certify under penalty of perjury under the laws of the United States of America that the 18 foregoing is true and correct, to the best of my knowledge. 19 20 DATED this 18th day of April, 2018 at Seattle, Washington. 21 LEE SMART, P.S., INC. 22 23 By:/s Pamela J. DeVet Pamela J. DeVet, WSBA No. 32882 24 Of Attorneys for Defendant 25 Safeguard Properties Management, LLC STIPULATED MOTION TO CHANGE RESPONSE

DEADLINE - 6 2:16-cv-920 MJP

Lee Smart, P.S., Inc. 701 Pike Street, Suite 1800 Seattle, WA 98101 206-624-7990 pjd@leesmart.com

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