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HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSAN CHEN, ET AL.,

Plaintiffs,

vs.

NATALIE D'AMICO, et al.,

Defendants.

CIVIL ACTION NO. 16-cv-01877-JLR

**STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
DEADLINES**

**Note on Motion Calendar:
August 14, 2017**

Plaintiff Susan Chen and Defendant Natalie D'Amico, and Defendant City of Redmond (the only defendants to have appeared in this action) (collectively, the "Parties") hereby submit this Stipulated Motion to Extend Case Deadlines ("Stipulated Motion") to extend by 60 days the deadlines stated in the Court's Order of July 5, 2017 (ECF No. 20).

The Parties stipulate and agree that in view of the recent appointment of pro bono counsel for Plaintiff Chen, the recent addition of new defendants in the Amended Complaint filed on August 9, 2017 (ECF No. 21), the time needed to effectuate service of process on the new defendants, and the need to meet and confer with these new defendants in planning discovery and case scheduling, the Parties stipulate and agree that there is good cause to extend by 60 days

STIPULATION AND ORDER TO EXTEND CASE
DEADLINES - 1
16-cv-01877-JLR

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1 all deadlines stated in the Court's Order of July 5, 2017.¹

2 Defendants do not waive any defenses by agreeing to the terms of this Stipulated Motion.

3 **NOW THEREFORE**, the Parties jointly move the Court for entry of the Proposed Order
4 below to extend case deadlines.

5 Stipulated and respectfully submitted this 14th day of August, 2017.

6 **DORSEY & WHITNEY LLP**

7
8 By: /s/Shawn Larsen-Bright

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*Attorneys for Defendants Natalie D'Amico
and City of Redmond*

25 ¹ Co-Plaintiff Naixiang Lian indicated by email on August 11, 2017 that he does not object to this proposed extension.

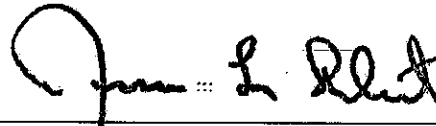
PROPOSED ORDER

The Court, having considered the Stipulated Motion to Extend Case Deadlines, and finding good cause to extend case deadlines by 60 days, hereby **ORDERS** a 60 day extension of the deadlines stated in the Court's Order of July 5, 2017, as follows:

1. Fed. R. Civ. P. 26(f) Conference Deadline: October 16, 2017
2. Initial Disclosure Deadline: October 23, 2017
3. Joint Status Report Due: October 30, 2017

IT IS SO ORDERED.

Dated this 15th day of August, 2017



Hon. James L. Robart
United States District Judge

Presented by:

DORSEY & WHITNEY LLP

/s/Shawn Larsen-Bright

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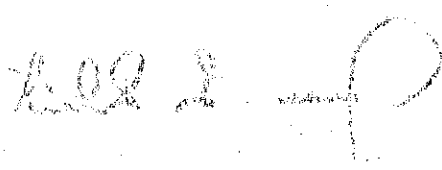
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12 *and City of Redmond*

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STIPULATION AND ORDER TO EXTEND CASE
DEADLINES - 4
16-cv-01877-JLR

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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

Aaron P. Riensche Geoff Bridgman Ogden Murphy Wallace, P.L.L.C. 901 Fifth Avenue, Suite 3500 Seattle, Washington 98164 Tel: 206-447-7000 ariensche@omwlaw.com gbridgman@omwlaw.com Attorneys for Defendant Natalie D'Amico	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification
Naixiang Lian PO BOX 134 Redmond, Washington 98073	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via ECF Notification

Dated this 14th day of August, 2017.

/s/Natasha Johnston
Natasha Johnston, Legal Assistant

