

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

ELTON MASON, an individual, dba  
WASHINGTON STATE TRUCKING, a sole  
proprietorship

Plaintiffs,

v.

WASHINGTON STATE, a state governmental  
entity, WASHINGTON STATE DEPART-  
MENT of TRANSPORTATION, a political  
subdivision governmental entity; LYNN  
PETERSON, in her official and individual  
capacities, LINEA LAIRD, in her official and  
individual capacities, OFFICE OF MINORITY  
WOMEN BUSINESS ENTERPRISES, a  
subdivision governmental entity, SEATTLE  
TUNNEL PARTNERS, a Joint Venture  
Dragados, U.S.A., Tutor Perini Corporation,  
CHRIS DIXON, in his official and individual  
capacities, RUSSELL STREADBECK in his  
official and individual capacities.

Defendants.

No. 2:17-cv-00186-TSZ

**JOINT STIPULATION AND ORDER TO  
ALLOW PLAINTIFF ADDITIONAL TIME  
TO FILE THEIR AMENDED COMPLAINT**

IT IS HEREBY STIPULATED by and between Beverly Grant and Elizabeth Lunde, counsel  
for Plaintiff herein, and Robert W. Ferguson, Attorney General, Celeste Stokes, counsel for the state

*Beverly Grant* Law  
Firm,  
P.S.

BEVERLY GRANT LAW FIRM, P.S.  
3929 Bridgeport Way W., Ste. 208  
University Place, WA. 98464  
235-252-5454

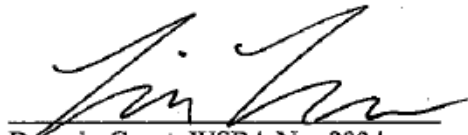
1 Defendants, Nathan Bays and Patty Eakes, counsel for Seattle Tunnel Partners, a Joint Venture, Chris  
2 Dixon, and Russel Streadbeck, that, subject to Court approval, Plaintiff be allowed an extension of  
3 time to file their Amended Complaint for the above-titled matter for the following reasons:

4 On June 13, 2017, the Court dismissed Plaintiff's initial complaint. At that time, the Court  
5 set a deadline of July 13, 2017 for filing an amended complaint. On June 29, 2017, Ms. Grant had  
6 an unexpected and emergent surgery for a broken femur and knee and is still recovering. In light of  
7 her medical condition, Plaintiff seeks to extend the deadline for filing an amended complaint to July  
8 24, 2017. Opposing counsel has no objection to the extension and has stipulated to the request.

9 For the above reasons, and subject to Court approval, the parties hereby agree and stipulate that  
10 the deadline for Plaintiff to file an amended complaint shall be extended to July 24, 2017.

11 DATED this 10 th day of July, 2017,


12 **BEVERLY GRANT LAW FIRM, P.S.**

13 

14 Beverly Grant, WSBA No. 8034  
15 Elizabeth Lunde, WSBA No. 51565  
16 Attorneys for Plaintiffs

17 **ROBERT W. FERGUSON**  
18 **Attorney General**

**CALFO EAKES & OSTROVSKY PLLC,**

19 

20 Celeste T. Stokes, ESBA No. 12180  
21 Attorneys for Defendants

/s/ Nathan Bays

22 Patricia A. Eakes, WSBA No. 18888  
23 Nathan Bays, WSBA No. 43025  
24 Attorneys for Defendants

Dated 7/10/17

Dated authorization for signature given 7/7/17 to atty EL

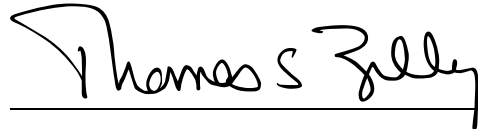
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235-252-5454

1 **ORDER**

2 IT IS HEREBY ORDERED that Plaintiff shall file the Amended Complaint on or before  
3 July 24, 2017.


4 DATED this 12th day of July, 2017.

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6 

7  
8 Thomas S. Zilly  
United States District Judge

9 Presented by:


10 **BEVERLY GRANT LAW FIRM, P.S.**

11   
12  
13 Beverly Grant, WSBA No. 8034  
Elizabeth Lunde, WSBA No. 51565  
14 Attorneys for Plaintiffs

15 Approved as to form and notice of presentation waived:

16 **ROBERT W. FERGUSON,**  
17 **Attorney General**

**CALFO EAKES & OSTROVSKY PLLC**

18   
19 Celeste T. Stokes, ESBA No. 12180  
20 Attorneys for Defendants

authorization for signature given 7/7/17 to  
attorney EL  
21 /s/ Nathan Bays  
22 Patricia A. Eakes, WSBA No. 18888  
23 Nathan Bays, WSBA No. 43025  
24 Attorneys for Defendants