STIPULATED MOTION AND [PROPOSED] ORDER

AMENDING CASE SCHEDULE

No. 2:17-cv-00476-MJP

LAW OFFICES OF

COZEN O'CONNOR

A PROFESSIONAL CORPORATION 999 THIRD AVENUE SUITE 1900 SEATTLE, WASHINGTON 98104 (206) 340-1000 Doc. 31

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STIPULATED MOTION

The parties agree and stipulate as follows:

The deadline to file Plaintiff's motion for class certification in this case has been set for December 14, 2017. (Minute Order Setting Trial Date and Related Dates, Dkt 22).

The parties are currently conducting discovery on class certification issues and are engaged in the meet and confer process regarding Plaintiff's outstanding discovery responses and document production. The parties believe that a one month continuance to file the motion for class certification will allow for proper resolution of their present discovery dispute, without disrupting the trial date of September 10, 2018 or the remaining case schedule.

Accordingly, the parties agree and stipulate that good cause exists to continue the deadline to file Plaintiff's Motion for Class Certification by approximately one month, to **January 18, 2017**. Pursuant to LCR 7(d)(3), Plaintiff shall note her motion for consideration on February 16, 2018, with Defendants' opposition briefs due on February 12, 2018, and Plaintiff's reply briefing due on February 16, 2018.

STIPULATED and AGREED:

Dated this 11th day of December, 2017

TOUSLEY BRAIN STEPHENS PLLC

By: <u>/s/ James M. Bulthuis</u> Chase Alvord, WSBA #26080

Email: calvord@tousley.com James M. Bulthuis, WSBA #44089 Email: JBulthuis@Tousley.com

Attorneys for Plaintiff Ayanna Rosenberg, individually, and on Behalf of all those similarly situated

Dated this 11th day of December, 2017

COZEN O'CONNOR

By: /s/ Anusha E. Jones

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Attorneys for Defendant CCS Commercial, LLC

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1 Dated this 8th day of December, 2017 Dated this 8th day of December, 2017 2 **HOLLAND & KNIGHT** IDE LAW OFFICE 3 By: /s/ Shannon Armstrong By: <u>/s/ Matthew James Ide</u> 4 Shannon Armstrong, WSBA #45947 Matthew James Ide, WSBA #26002 Email: mjide@yahoo.com Email: Shannon.armstrong@hklaw.com 5 J. Matthew Donohue, WSBA #52455 Email: matt.donohue@hklaw.com Attorney for Plaintiff Ayanna Rosenberg, 6 individually, and on Behalf of all those Attorneys for Defendant Progressive Direct similarly situated 7 Insurance Company 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

STIPULATED MOTION AND CORRESPONDENT ORDER AMENDING CASE SCHEDULE
No. 2:17-cv-00476-MJP

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ORDER otion, and

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that Plaintiff's motion for class certification be filed no later than January 18, 2018, and that the Case Schedule be amended as indicated.

DATED this 13 day of December, 2017.

The Honorable Marsha J. Pechman United States District Judge

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