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Honorable Marsha J. Pechman

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

AYANNA ROSENBERG, individually, and on  
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, L.L.C., (d/b/a Credit  
Collection Services Commercial), and  
PROGRESSIVE DIRECT INSURANCE  
COMPANY,

Defendants.

Case No. 2:17-cv-00476-MJP

**STIPULATED MOTION AND ORDER  
AMENDING CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:  
MARCH 7, 2018**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court’s Chamber Procedures, Plaintiff Ayanna Rosenberg (“Plaintiff”) and Defendants CCS Commercial, LLC and Progressive Direct Insurance Company (collectively, “Defendants”), by and through their counsel, hereby stipulate and move for a one-month continuance of the deadline for the parties to exchange expert witness reports pursuant to FRCP 26(a)(2)(B) due to the current schedule for class certification.

**STIPULATED MOTION**

The parties agree and stipulate as follows:

The noting date for plaintiff’s motion for class certification is March 9, 2018.

1 The deadline for the parties to exchange expert witness reports is March 14, 2018. (Dkt. #  
2 22.)

3 The parties expect that the Court will not resolve plaintiff's motion for class certification by  
4 the current expert witness deadline. Thus, the current schedule may require the parties to exchange  
5 expert reports regarding liability before the parties know the existence or scope of the potential class  
6 in this case. The parties believe that a one month continuance to exchange expert reports will  
7 provide sufficient time for the Court to resolve plaintiff's motion for class certification without  
8 disrupting the remaining case schedule.

9 Accordingly, the parties agree and stipulate that good cause exists to continue the deadline to  
10 exchange expert witness reports by approximately one month, to **April 13, 2018**.

11 **STIPULATED and AGREED:**

12 Dated this 7<sup>th</sup> day of March, 2018

13 TOUSLEY BRAIN STEPHENS PLLC

COZEN O'CONNOR

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24 *Attorney for Plaintiff Ayanna Rosenberg,  
25 individually, and on Behalf of all those  
26 similarly situated*

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**ORDER**

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that the deadline to exchange expert witness reports is extended to **April 13, 2018**, and that the Case Schedule be amended as indicated.

DATED this 8th day of March, 2018.



Marsha J. Pechman  
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED] ORDER AMENDING CASE SCHEDULE to be served on the following person[s]:

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by causing the document to be delivered by the following indicated method or methods:

- by CM/ECF electronically mailed notice from the Court on the date set forth below.
- by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED March 7, 2018.

s/ Kristin M. Asai  
Kristin M. Asai