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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  
[REDACTED] ORDER AMENDING  
CASE SCHEDULE FOR SOLE  
PURPOSE OF CONTINUING ONE OUT-  
OF-STATE 30(B)(6) DEPOSITION OF  
PROGRESSIVE**

**NOTE ON MOTION CALENDAR:  
MAY 10, 2018**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court’s Chamber Procedures, plaintiff Ayanna Rosenberg, defendants CCS Commercial, LLC (“CCS”), and Progressive Direct Insurance Company (“Progressive”), by and through their counsel, hereby stipulate and move for a three-week continuance of the discovery deadline.

**STIPULATED MOTION**

The parties agree and stipulate as follows:

The current discovery deadline is May 16, 2018. Plaintiff is scheduled to take a Rule 30(b)(6) deposition of Progressive on May 14, 2018.

STIPULATED MOTION AND [REDACTED] ORDER  
AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF  
CONTINUING ONE OUT-OF-STATE 30(B)(6)  
DEPOSITION OF PROGRESSIVE (2:17-CV-00476-MJP) -  
PAGE 1

**HOLLAND & KNIGHT LLP**  
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111 SW Fifth Avenue  
Portland, OR 97204  
Telephone: 503.243.2300

1 Based on the parties' schedules and ongoing settlement negotiations, the parties have agreed  
2 to postpone the deposition of Progressive. The parties believe that a three-week continuance of the  
3 discovery deadline will provide sufficient time for plaintiff to complete the deposition of Progressive  
4 without disrupting the remaining case schedule.

5 Accordingly, the parties agree and stipulate that good cause exists to continue the discovery  
6 deadline for three weeks, for the sole purpose of completing the deposition of Progressive, to **June**  
7 **6, 2018.**

8 **STIPULATED and AGREED:**

9 Dated this 10th day of May, 2018

10 TOUSLEY BRAIN STEPHENS PLLC

BULLIVANT HOUSER BAILEY PC

11 By: /s/ Chase Alvord

By: /s/ Matthew J. Sekits

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CCS Commercial, LLC*

16  
17 *Attorney for Plaintiff Ayanna Rosenberg,  
18 individually, and on Behalf of all those  
similarly situated*

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By: /s/ J. Matthew Donohue

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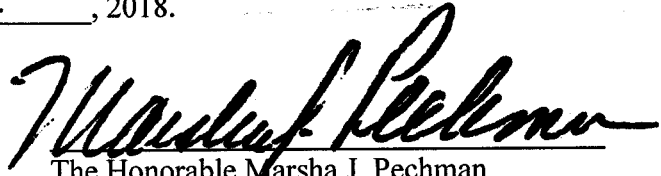
*Attorneys for Defendant Progressive Direct  
Insurance Company*

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**ORDER**

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that the discovery deadline is extended to **June 6, 2018**, for the sole purpose of completing the deposition of Progressive, and that the Case Schedule be amended as indicated.

DATED this 1<sup>th</sup> day of May, 2018.



The Honorable 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 FOR SOLE PURPOSE OF CONTINUING ONE OUT-OF-STATE 30(B)(6) DEPOSITION OF PROGRESSIVE to be served on the following person[s]:

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Attorneys for Plaintiff

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 May 10, 2018.

/s/ Kristin M. Asai  
Kristin M. Asai

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