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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 SUMMARY JUDGMENT
SCHEDULE**

**NOTE ON MOTION CALENDAR:
JUNE 13, 2018**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court’s Chamber Procedures, plaintiff Ayanna Rosenberg, defendant CCS Commercial, LLC (“CCS”), and defendant Progressive Direct Insurance Company (“Progressive”), by and through their counsel, hereby stipulate and move for a consolidated briefing schedule on their cross motions for summary judgment under LCR 7(k).

STIPULATED MOTION

The parties agree and stipulate as follows:

Plaintiff filed a motion for partial summary judgment on May 31, 2018, with a noting date of June 22, 2018. Progressive filed a motion for summary judgment on June 12, 2018, with a noting date of July 6, 2018.

1 Pursuant to LCR 7(k), the parties have agreed to modify the current briefing schedule for
2 their cross motions for summary judgment, and to allow plaintiff to combine her reply and response
3 memoranda into a single extra-length brief. Accordingly, the parties agree and stipulate that good
4 cause exists to modify the briefing schedule as follows:

5 Progressive and CCS will file their responses to plaintiff's motion for partial summary
6 judgment, which will not exceed 24 pages each, on **June 20, 2018**.

7 Plaintiff will file a combined response to Progressive's motion for summary judgment and
8 reply in support of plaintiff's partial motion for summary judgment, which will not exceed 48 pages,
9 on **July 2, 2018**.

10 Progressive will file its reply in support of its motion for summary judgment (limited to
11 arguments I, II, and IV in Progressive's motion), which will not exceed 12 pages, on **July 6, 2018**.

12 **STIPULATED and AGREED:**

13 Dated this 13th day of June, 2018

14 TOUSLEY BRAIN STEPHENS PLLC

15 By: /s/ Chase Alvord

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

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ORDER

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that the briefing schedule for plaintiff's motion for partial summary judgment and Progressive's motion for summary judgment be amended as indicated. Plaintiff's motion for partial summary judgment and Progressive's motion for summary judgment shall both be noted for consideration on July 6, 2018.

DATED this 14th day of June, 2018.



The Honorable Marsha J. Pechman
United States Senior District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED] ORDER AMENDING SUMMARY JUDGMENT SCHEDULE 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 June 13, 2018.

/s/ Kristin M. Asai
Kristin M. Asai