

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

HONORABLE JAMES L. ROBERT

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

SUSAN CHEN, ET AL.,

Plaintiffs,

vs.

NATALIE D'AMICO,

Defendant.

CIVIL ACTION NO. 16-cv-01877-JLR

**JOINT RESPONSE TO ORDERS TO
SHOW CAUSE AND STIPULATED
MOTION TO CONSOLIDATE
CASES AND EXTEND CASE
DEADLINES**

SUSAN CHEN, ET AL.,

Plaintiffs,

vs.

CITY OF REDMOND,

Defendant.

CIVIL ACTION NO. 17-cv-00569-JLR

JOINT RESPONSE TO ORDERS TO SHOW CAUSE
AND STIPULATED MOTION TO CONSOLIDATE
CASES AND EXTEND CASE DEADLINES - 1
16-cv-01877-JLR

DORSEY & WHITNEY LLP
COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 6100
SEATTLE, WA 98104-7043
PHONE: (206) 903-8800
FAX: (206) 903-8820

1
2 Plaintiff Susan Chen, Defendant Natalie D'Amico, and Defendant City of Redmond in
3 the two above-captioned actions (collectively, the "Parties") hereby submit this Joint Response
4 to the Court's Order to Show Cause in *Susan Chen, et al. v. Natalie D'Amico*, No. 16-CV-1877
5 (ECF No. 18) and the Order to Show Cause in *Susan Chen, et al. v. City of Redmond*, No. 17-
6 CV-569 (ECF No. 16). Pursuant to CR 42(a) and LCR 42, the Parties jointly bring this
7 Stipulated Motion to Consolidate Cases and Extend Case Deadlines ("Stipulated Motion") to
8 consolidate these actions, and to extend by 30 days the deadlines stated in the Court's Order
9 Granting Second Request to Extend Deadlines in *Susan Chen, et al. v. City of Redmond*, No. 17-
10 CV-569 (ECF No. 13) ("Order to Extend").
11

12 The Parties stipulate and agree that the two above-captioned actions involve common
13 questions of facts and law, such that consolidation is appropriate in the interests of justice,
14 judicial economy, and avoidance of unnecessary costs and delay. In view of the recent
15 appointment of pro bono counsel for Plaintiff Chen, the Parties stipulate and agree that there is
16 good cause to extend by 30 days all deadlines stated in the Court's Order to Extend.
17

18 Defendants do not waive any defenses by agreeing to the terms of this stipulated motion.
19

20 **NOW THEREFORE**, the Parties jointly move the Court for entry of the Proposed Order
21 below to consolidate the two above-captioned actions and extend case deadlines.
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Stipulated and respectfully submitted this 30th day of June, 2017.

DORSEY & WHITNEY LLP

By: /s/T. Augustine Lo

Shawn Larsen-Bright, WSBA # 37066
T. Augustine Lo, WSBA # 48060
701 Fifth Avenue, Suite 6100
Seattle, WA 98104
Tel. 206-903-8825
larsen.bright.shawn@dorsey.com
lo.augustine@dorsey.com
Attorneys for Plaintiff Susan Chen

OGDEN MURPHY WALLACE, PLLC

By: /s/Aaron P. Riensche

Aaron P. Riensche
Geoff Bridgman
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
Tel. 206-447-7000
ariensche@omwlaw.com
gbridgman@omwlaw.com
Attorneys for Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATION OF MEET AND CONFER

In accordance with LCR 42(b), I hereby certify that I met and conferred with the other parties to this Stipulated Motion to Consolidate Cases (“Stipulated Motion”) by way of an exchange of electronic mail with counsel for Defendant Natalie D’Amico and Defendant City of Redmond on June 23, 2017; June 26, 2017; June, 28, 2017; and June 30, 2017. The Parties stipulate and agree that two above-captioned actions should be consolidated, and that the pending case deadlines should be further extended by 30 days. On June 27, 2017, I communicated by e-mail with Co-Plaintiff Naixiang Lian, who appears not to be represented in the above-captioned actions, disclosed my representation of Plaintiff Chen in the above-captioned actions, and asked for his view on the proposed consolidation and extension of deadlines by 30 days. On June 28, 2017, Co-Plaintiff Lian responded by email: “I do not object to your two requests: proposal for consolidating two cases and extension of deadlines.”

Dated: June 30, 2017

/s/ T. Augustine Lo
T. Augustine Lo, WSBA # 48060

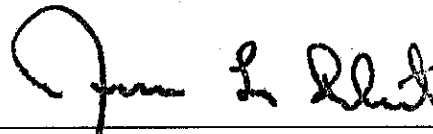
~~PROPOSED~~ ORDER

The Court, having considered the Stipulated Motion to Consolidate Cases and Extend Case Deadlines, and finding good cause to consolidate the two above-captioned actions and extend case deadlines by 30 days, hereby **ORDERS** that the Clerk of Court consolidate the two above-captioned actions into Case No. 16-CV-1877, and further **ORDERS** a 30 day extension of the deadlines stated in the Court's Order to Extend, as follows:

1. Fed. R. Civ. P. 26(f) Conference Deadline: August 15, 2017
2. Initial Disclosure Deadline: August 22, 2017
3. Joint Status Report Due: August 29, 2017

IT IS SO ORDERED.

Dated this 5th day of July, 2017



Hon. James L. Robart
United States District Judge

Presented by:

DORSEY & WHITNEY LLP

/s/T. Augustine Lo

Shawn Larsen-Bright, WSBA # 37066
T. Augustine Lo, WSBA # 48060
701 Fifth Avenue, Suite 6100
Seattle, WA 98104
Tel. 206-903-8825
larsen.bright.shawn@dorsey.com
lo.augustine@dorsey.com

Attorneys for Plaintiff Susan Chen

1
2 OGDEN MURPHY WALLACE, PLLC

3 /s/Aaron P. Riensche

4 Aaron P. Riensche

5 Geoff Bridgman

6 901 Fifth Avenue, Suite 3500

7 Seattle, WA 98164

8 Tel. 206-447-7000

9 ariensche@omwlaw.com

10 gbridgman@omwlaw.com

11 *Attorneys for Defendants Natalie D'Amico*
12 *and City of Redmond*

13
14
15
16
17
18
19
20
21
22
23
24
25

JOINT RESPONSE TO ORDERS TO SHOW CAUSE
AND STIPULATED MOTION TO CONSOLIDATE
CASES AND EXTEND CASE DEADLINES - 6
16-cv-01877-JLR

DORSEY & WHITNEY LLP
COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 6100
SEATTLE, WA 98104-7043
PHONE: (206) 903-8300
FAX: (206) 903-8820

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

Aaron P. Riensche Geoff Bridgman Ogden Murphy Wallace, P.L.L.C. 901 Fifth Avenue, Suite 3500 Seattle, Washington 98164 Tel: 206-447-7000 ariensche@omwlaw.com gbridgman@omwlaw.com Attorneys for Defendant Natalie D'Amico	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification
Naixiang Lian PO BOX 134 Redmond, Washington 98073	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via ECF Notification

Dated this 30th day of June, 2017.

/s/Natasha Johnston
Natasha Johnston, Legal Assistant