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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KELLY BOLDING, MICHAEL MANFREDI,  
and SARAH WARD, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

BANNER BANK, a Washington Corporation,

Defendant.

No. C17-0601RSL

STIPULATED MOTION AND  
~~PROPOSED~~ ORDER  
TEMPORARILY STAYING  
PROCEEDINGS AND  
VACATING CASE SCHEDULE  
PENDING MEDIATION

*Note on Motion Calendar:*  
March 20, 2019

**STIPULATED MOTION**

The parties, through their attorneys, respectfully advise the Court they have agreed to seek resolution of this case through mediation. The parties have selected Mark S. Rudy of Rudy, Exelrod, Zeiff & Lowe, LLP to serve as mediator. Mr. Rudy is one of the most experienced and sought-after mediators for employment class actions. In consequence, the earliest mediation date the parties were able to schedule with Mr. Rudy is August 8, 2019.

The parties believe it is in the interests of their respective clients and of judicial economy and efficiency to (i) stay until September 1, 2019,<sup>1</sup> all further proceedings in this

<sup>1</sup> This is to allow time for the parties to document any settlement-in-principle they may reach at the mediation.  
STIPULATION AND ORDER

1 litigation, including without limitation all formal discovery,<sup>2</sup> and (ii) vacate deadlines that  
2 relate to expert disclosure, as well as all deadlines that have not yet passed, to be reset if the  
3 parties' settlement efforts do not succeed. Therefore, Plaintiffs and Banner Bank respectfully  
4 stipulate to, and jointly request that the Court enter, the proposed Order set forth below staying  
5 proceedings and vacating case deadlines.

6 If a settlement agreement is not reached between the parties by September 1, the stay  
7 will be automatically lifted on that date, unless there is good cause to lift it sooner. In that case,  
8 the parties will advise the Court that settlement efforts have failed, and will within ten days of  
9 September 1 file a Joint Status Report that includes new proposed case deadlines.

10  
11 It is so stipulated and presented by the following counsel this 20th day of March 2019.

12 The Blankenship Law Firm, PLLC  
13 Attorneys for Plaintiffs

Davis Wright Tremaine LLP  
Attorneys for Defendant Banner Bank

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By s/Kenneth E. Payson

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## ORDER

22 The Court has considered and approves the parties' stipulation. This action is stayed  
23 until September 1, 2019, including all formal discovery. The Amended Order Setting Trial  
24 Date & Related Dates [Dkt. # 131] is VACATED, and all deadlines that relate to expert  
25 disclosure and all deadlines that have not yet passed are vacated. Deadlines shall be reset if the

26  
27 <sup>2</sup> The parties agreed to cooperate in good faith to exchange informally any additional information and documents, including informal discovery related to damages, that the parties may require to prepare for and conduct mediation.

1 parties' settlement efforts do not succeed. The parties shall promptly notify the Court if they  
2 reach a settlement.

3 The stay shall be automatically lifted on September 1, 2019, unless there is good cause  
4 to lift it sooner. Within ten days after expiration of the stay set forth above, the parties shall  
5 submit a Joint Status Report that includes new proposed case deadlines including a trial date if  
6 the parties' settlement efforts do not succeed.

7 IT IS SO ORDERED.

8 DATED this 22<sup>nd</sup> day of March, 2019.

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10 Robert S. Lasnik  
11 UNITED STATES DISTRICT JUDGE  
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