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The Honorable James L. Robart

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

EARL BEARD and ALEXIS LOPEZ, CRAIG  
BAHAM, and ROBERT VAN HORN,

Case No. 2:17-cv-00663-JLR

Plaintiffs,

**STIPULATION FOR LIMITED  
EXTENSION OF JOINT STATUS  
REPORT DEADLINE AND  
[PROPOSED] ORDER**

v.

ECOLAB, INC.,

Defendant.

*Noted For Consideration:*  
July 12, 2017

**STIPULATION**

The parties hereby stipulate and jointly request that the Court grant a two-week extension of the Joint Status Report deadline from July 14, 2017 to July 28, 2017. Good cause exists for the extension as described herein.

On April 27, 2017, Plaintiffs Earl Beard and Alexis Lopez filed a Collective Action Complaint. Dkt. No. 1. On May 3, 2017, Plaintiffs filed the opt-in consent forms of Craig Baham and Robert Van Horn. Dkt. No. 7. On June 9, 2017, the Court entered an Order Regarding Initial Disclosures, Joint Status Report and Early Statement, which set a deadline of July 14, 2017 for the parties' Joint Status Report, among other deadlines. Dkt. No. 15.

**STIPULATION FOR LIMITED EXTENSION OF  
JOINT STATUS REPORT DEADLINE AND  
[PROPOSED] ORDER - 1**  
Case No. 2:17-cv-00663-JLR

LITTLER MENDELSON, P.C.  
One Union Square  
600 University Street, Suite 3200  
Seattle, WA 98101.3122  
206.623.3300

1 On June 22, 2017, the parties participated in a telephone conference pursuant to Federal  
2 Rule of Civil Procedure 26(f) and were prepared to discuss a draft Joint Status Report. At that  
3 time, Plaintiffs indicated that they did not expect other opt-in plaintiffs to join the action because  
4 the potential claims of other potential claimants had already been resolved. The parties  
5 participated in a follow-up conference on June 27, 2017. As a result of these discussions,  
6 Plaintiffs filed a First Amended Complaint on June 29, 2017. Dkt. No. 19. The First Amended  
7 Complaint identified Beard, Lopez, Baham, and Van Horn as named Plaintiffs and removed  
8 Plaintiffs' collective and class action allegations. This amendment changed the scope of the case  
9 and the draft Joint Status Report that the parties had been discussing.

10 Further, the parties have been engaged in extensive discussions in an attempt to resolve  
11 this entire matter. The parties respectfully request that the Court allow a brief two-week  
12 extension of the Joint Status Report deadline so that the parties can complete their discussions  
13 and avoid incurring unnecessary expense and the time and resources of the Court. This  
14 extension will not affect any other deadlines in the case.

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**STIPULATION FOR LIMITED EXTENSION OF  
JOINT STATUS REPORT DEADLINE AND  
[PROPOSED] ORDER - 2**  
Case No. 2:17-cv-00663-JLR

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 July 12, 2017

3  
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Attorneys for Plaintiffs

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20 Attorneys for Defendant  
ECOLAB, INC.

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**STIPULATION FOR LIMITED EXTENSION OF  
JOINT STATUS REPORT DEADLINE AND  
[PROPOSED] ORDER - 3  
Case No. 2:17-cv-00663-JLR**

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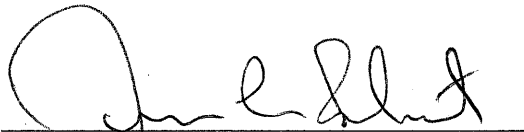
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**ORDER**

Pursuant to the parties' agreement, it is hereby ORDERED that:

1. The Stipulation for Limited Extension of Joint Status Report Deadline is GRANTED.
2. The parties' Joint Status Report shall be due on July 28, 2017.

DATED: 12 July 2017



The Honorable James L. Robart  
U.S. District Judge

**CERTIFICATE OF SERVICE**

I am a resident of the State of Washington, over the age of eighteen years, and not a party to the within action. My business address is One Union Square, 600 University Street, Ste. 3200, Seattle, WA 98101. On July 12, 2017, I

**ELECTRONICALLY FILED** the foregoing document(s) with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

<p>Michael C. Subit, WSBA #29189  <a href="mailto:msubit@frankfreed.com">msubit@frankfreed.com</a>  FRANK FREED SUBIT &amp; THOMAS  Hoge Building  705 Second Avenue, Suite 1200  Seattle, WA 98104-1729  Phone: 206-682-6711</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>Michael J.D. Sweeney  <i>Pro Hac Vice</i>  <a href="mailto:mswceny@getmansweeney.com">mswceny@getmansweeney.com</a>  Artemio Guerra  <i>Pro Hac Vice</i>  <a href="mailto:aguerra@getmansweeney.com">aguerra@getmansweeney.com</a>  GETMAN SWEENEY &amp; DUNN PLLC  260 Fair Street, Kingston,  New York 12401  Phone: 845-255-9370  Fax: 845-255-8749</p> <p><i>Attorneys for Plaintiffs</i></p>
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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 12, 2017, at Seattle, Washington.

s/ Sally Swearinger  
Sally Swearinger  
[sswearinger@littler.com](mailto:sswearinger@littler.com)  
**LITTLER MENDELSON, P.C.**

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**STIPULATION FOR LIMITED EXTENSION OF  
JOINT STATUS REPORT DEADLINE AND  
[PROPOSED] ORDER - 3**  
Case No. 2:17-cv-00663-JLR

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