Case 2:17-cv-00707-JLR Document 22 Filed 07/11/17 Page 1 of 4

1 The Honorable James L. Robart 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 DEVELOPERS SURETY AND INDEMNITY Case No. 2:17-cv-00707-JLR 8 COMPANY, an Iowa corporation, 9 Plaintiff, STIPULATED MOTION AND PROPOSED ORDER TO EXTEND DEADLINE TO FILE 10 FED. R. CIV. P. 26(f) AND LCR 26(f) JOINT STATUS REPORT AND DISCOVERY ALIS HOMES, LLC, a Washington state 11 **PLAN** limited liability company; and HOLESHOT 12 PROPERTIES, LLC, a Washington state NOTE ON MOTION CALENDAR: July 11, limited liability company, as assignee of PACWEST INVESTMENT GROUP, INC., a 13 Nevada corporation, 14 Defendants. 15 16 17 18 19 20 21 22 23 STIPULATED MOTION AND PROPOSED ORDER TO EXTEND DEADLINE TO 24 FILE JOINT STATUS REPORT AND DISCOVERY PLAN (2:17-cv-00707-JLR) - Page 1 SMITH FREED EBERHARD P.C. 111 SW 5th Avenue, Suite 4300 Portland, Oregon 97204 P: 503.227.2424 F: 503.227.2535

1	Pursuant to Fed. R. Civ. P. 16 (b)(4) and LCR 10(g), the parties hereby stipulate to and		
2	respectfully move for a 14-day extension for them to file the Combined Joint Status Report and		
3	Discovery Plan required under Fed. R. Civ. P 26(f) and LCR 26(f). The current deadline,		
4	pursuant to the Court's Order Regarding Initial Disclosures, Joint Status Report, and		
5	Early Settlement, is July 12, 2017. With the extension, the new deadline would be July 26, 2017		
6	The parties held their Rule 26(f) conference by telephone on June 19, 2017, and continued that		
7	conference on June 26, 2017. Counsel for plaintiff Developers Surety and Indemnity Company		
8	has not yet circulated to the other parties a first draft of the Combined Joint Status Report and		
9	Discovery Plan due to press of business but inter	nds to do so today. The parties respectfully seek	
10	this extension so that they may finalize the Combined Joint Status Report and Discovery Plan for		
11	filing with the court and they do so for good cause and not for any reasons of delay.		
12	IT IS SO STIPULATED.		
13	Dated this 11 <sup>th</sup> day of July, 2017.		
14	SMITH FREED EBERHARD P.C.	BLADO KIGER BOLAN, P.S.	
15	By: s/Chin See Ming	By: s/Douglas N. Kiger	
16	Kyle D. Riley, WSBA #38078 Email: kdr@smithfreed.com	Douglas N. Kiger, WSBA #26211 Email: doug@bkb-law.com	
17	Jack Levy, admitted pro hac vice	4717 South 19th Street, Suite 109 Tacoma, WA 98405	
18	Email: <u>jlevy@smithfreed.com</u> Chin See Ming, admitted pro hac vice	Tel: 253.272.2997 Fax: 253.627.6252	
19	Email: cming@smithfreed.com 111 SW 5th Avenue, Suite 4300	Attorneys for Defendant Alis Homes, LLC	
20	Portland, OR 97204 Tel: 503.227.2424		
21	Fax: 503.227.2535		
22	Attorneys for Plaintiff Developers Surety and Indemnity Company		
23	Indominity Company		
24	STIPULATED MOTION AND PROPOSED OF FILE JOINT STATUS REPORT AND DISCO		

SMITH FREED EBERHARD P.C. 111 SW 5th Avenue, Suite 4300 Portland, Oregon 97204 P: 503.227.2424 F: 603.227.2535

## Case 2:17-cv-00707-JLR Document 22 Filed 07/11/17 Page 3 of 4

1	SMITH ALLING, P.S.
2	
3	By: <i>/s Chad E. Aherns</i> Chad E. Ahrens, WSBA #36149 Email: chad@smithalling.com
4	Matthew C. Niemela, WSBA #49610 Email: matt@smithalling.com
5	1501 Dock Street Tacoma, WA 98402
6	Tel: 253.627.1091 Fax: 253.627.0123
7	Attorneys for Defendant Holeshot Properties,
8	LLC
9	IT IS SO ORDERED.
10	Dated this 11th day of July, 2017
11 12	$\left( \right) $
13	UNITED STATES DISTRICT JUDGE
14	
15	
16	
17	•
18	
19	
20	
21	
22	
23	
24	STIPULATED MOTION AND PROPOSED ORDER TO EXTEND DEADLINE TO 299i47 FILE JOINT STATUS REPORT AND DISCOVERY PLAN (2:17-cv-00707-JLR) - Page 3 SMITH FREED EBERHARD P.C.

SMITH FREED EBERHARD P.C. 111 SW 5th Avenue, Suite 4300 Portland, Oregon 97204 P: 503.227.2424 F: 503.227.2535

CERTIFICATE OF SERVICE 1 I hereby certify that on the date set forth below, I caused to be served a true and correct 2 copy of the foregoing STIPULATED MOTION AND PROPOSED ORDER TO EXTEND 3 DEADLINE TO FILE FED. R. CIV. P. 26(f) AND LCR 26(f) JOINT STATUS REPORT AND 4 DISCOVERY PLAN via electronic transmission through the Court's CM/ECF system, on the 5 following: 6 Chad E. Ahrens, WSBA #36149 7 Douglas N. Kiger, WSBA #26211 Email: doug@bkb-law.com Email: chad@smithalling.com Matthew C. Niemela, WSBA #49610 BLADO KIGER BOLAN, P.S.4717 South 8 Email: matt@smithalling.com 19th Street, Suite 109 SMITH ALLING, P.S. Tacoma, WA 98405 9 1501 Dock Street Tel: 253.272.2997 Tacoma, WA 98402 Fax: 253.627.6252 10 Tel: 253.627.1091 Fax: 253.627.0123 Attorneys for Defendant Alis Homes, LLC 11 Attorneys for Defendant Holeshot Properties, 12 13 DATED: July 11, 2017. 14 SMITH FREED EBERHARD P.C. 15 By: s/Chin See Ming 16 Kyle D. Riley, WSBA #38078 Email: kdr@smithfreed.com 17 Jack Levy, admitted pro hac vice 18 Email: <u>ilevy@smithfreed.com</u> Chin See Ming, admitted pro hac vice 19 Email: cming@smithfreed.com 111 SW 5th Avenue, Suite 4300 20 Portland, OR 97204 Tel: 503.227.2424 21 Fax: 503.227.2535 22 Attorneys for Plaintiff Developers Surety and Indemnity Company 23 CERTIFICATE OF SERVICE (2:17-cv-00707-JLR) - Page 1

24

SMITH FREED EBERHARD P.C. 111 SW 5th Avenue, Suite 4300 Portland, Oregon 97204 P: 503.227.2424 F: 503.227.2535