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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

Omar Martinez Hernandez,

Plaintiff,

v.

Experian Information Solutions, Inc.,

Defendant.

Case No. 2:17-cv-00722-RSM

**UNOPPOSED STIPULATED MOTION
AND ORDER EXTENDING PRETRIAL
DEADLINES AND TO CONTINUE
TRIAL DATE**

STIPULATION

1. Plaintiff Omar Martinez Hernandez (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”) (collectively, “the Parties”), by and through their attorneys of record, file this unopposed motion and agree to stipulate to extend the current pretrial and trial deadlines listed in the June 26, 2017 scheduling order.

2. Good cause exists for the requested extension of the pretrial deadlines and the trial date. The parties have been working diligently to complete discovery in this matter. However, Experian’s counsel experienced a major medical emergency for one of her children which has hindered the parties abilities to complete all discovery. Despite this hardship, the Parties have served and responded to written discovery requests and have also produced numerous documents. The Parties are also in the midst of discussing settlement and are hopeful that they may be able to reach a resolution prior to incurring the costs associated with conducting depositions.

3. As such, the Parties respectfully request the following extensions in the case:

- a. Discovery deadline extended from December 18, 2017 until
February 19, 2018;

- 1 b. Deadline for dispositive motions to be filed from January 16, 2018 until
2 March 13, 2018;
- 3 c. Deadline to hold Mediation, **if requested by the parties**, from March 2,
4 2018 until May 4, 2018;
- 5 d. Deadline for Motions in Limine to a date appropriate to the new trial date;
- 6 e. Deadline to file Pretrial Order to a date appropriate to the new trial date;
- 7 f. Pretrial Conference changed to a date appropriate to the new trial date;
- 8 g. Trial Briefs changed to a date appropriate to the new trial date;
- 9 h. Proposed voir dire/jury instruction date will be changed to a date
10 appropriate to a new trial date.

11 5. The Parties also stipulate to a continuance of the present trial date to a new date in
12 accordance with the above schedules.

13 6. The Parties propose rescheduling the trial date for some time in June or July, 2018.

14 DATED: December 15, 2017

15 ROBERT S. SOLA, P.C.

16 By: /s/ Robert S. Sola
17 Robert S. Sola
18 Admitted Pro Hac Vice
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 Telephone: (503) 295-6880

20 Christopher E. Green, WSBA 19410
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22 225 106th Ave NE
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23 Attorneys for Plaintiff

 DATED: December 15, 2017

 JONES DAY

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 Angela M. Taylor, CASBN 210425
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 By: /s/ Rachel L. Dunnington
 Rachel L. Dunnington, WSBA No. 47021
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 Attorneys for Defendant
 EXPERIAN INFORMATION SOLUTIONS,
 INC.

1 **ORDER**

2 **THIS MATTER** came before the Court on the foregoing stipulation of the parties. The
3 Court has reviewed the parties' stipulation and, finding that the same is made for good cause, the
4 Court hereby

5 **ORDERS** that the current pretrial deadlines shall each be extended as follows:

- 6 a. Discovery deadline extended from December 18, 2017 until
7 February 19, 2018;
- 8 b. Deadline for dispositive motions to be filed from January 16, 2018 until
9 March 13, 2018;
- 10 c. Deadline to hold Mediation, **if requested by the parties**, from March 2,
11 2018 until May 4, 2018;
- 12 d. Deadline for Motions in Limine to a date appropriate to the new trial date;
- 13 e. Deadline to file Pretrial Order to a date appropriate to the new trial date;
- 14 f. Pretrial Conference changed to a date appropriate to the new trial date;
- 15 g. Trial Briefs changed to a date appropriate to the new trial date;
- 16 h. Proposed voir dire/jury instruction date will be changed to a date
17 appropriate to a new trial date.

18 **ORDERS** that the trial date shall be continued in accordance with the above schedule;
19 and the Court further

20 **ORDERS** that Plaintiff's counsel shall contact the Court's in-court Deputies, Laurie
21 Cuaresma and Lowell Williams, at laurie_cuaresma@wawd.uscourts.gov and
22 lowell_williams@wawd.uscourts.gov, within ten (10) days of the date of this Order with several
23 proposed, agreed trial dates in this matter, after which the Court will issue an Amended
24 Scheduling Order.

25 **IT IS SO ORDERED.**

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1 **DATED** this 18th day of December, 2017.

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7 Presented by:

8 JONES DAY

9

10 /s/ Angela M. Taylor
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14 EXPERIAN INFORMATION SOLUTIONS, INC.

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RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE