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THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

FULLTIME FANTASY SPORTS, LLC a  
Delaware limited liability company,

Plaintiff,

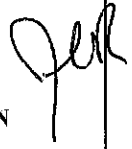
v.

STEVEN and JANE DOE RINDNER, and  
their marital community; MARK and JANE  
DOE STIEGLITZ, and their marital  
community; DOUG and JANE DOE SMITH,  
and their marital community; CRAIG and  
JANE DOE MALLITZ, and their marital  
community; ROSS and JANE DOE  
LEVINSOHN, and their marital community;  
ROSS and JANE DOE LUKATSEVITCH, and  
their marital community; JOE and JANE DOE  
ROBINSON, and their marital community;  
TAMMER and JANE DOE FAHMY, and their  
marital community; MAYO and JANE DOE  
STUNTZ, and their marital community;  
JAMES and JANE DOE HECKMAN, and  
their marital community, PAUL and JANE  
DOE MCNICHOL, and their marital  
community thereof; ANDREW and JANE  
DOE RUSSELL, and their marital community  
thereof; HOWARD and JANE DOE LIPSON,  
and their marital community thereof, PILOT  
GROUP, GP, LLC, a Delaware corporation;  
and JANE and JOHN DOES 1 through 8,

Defendants.

Case No. 2:17-cv-00920-JLR

STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING DEADLINE TO FILE JOINT  
STATUS REPORT AND DISCOVERY PLAN



Noting Date: September 27, 2017

STIP. AND ORDER RE JSR DEADLINE  
CASE NO. 2:17-CV-00920-JLR

COOLEY LLP  
1700 SEVENTH AVE., STE. 1900  
SEATTLE, WA 98101-1355  
(206) 452-8700

1 Pursuant to LCR 10(g), Plaintiff Fulltime Fantasy Sports, LLC and Defendants Tammer  
2 Fahmy, Howard Lipson, Ross Lukatsevich, Craig Mallitz, Paul McNicol, Joe Robinson, Andrew  
3 Russell, Doug Smith, Mark Stieglitz, and Mayo Stuntz<sup>1</sup> hereby stipulate to and request an  
4 extension of the Parties' deadline to file their Joint Status Report and Discovery Plan as set forth  
5 in the Court's Order regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt.  
6 No. 8) as modified by the Parties' previous stipulation and resulting order (Dkt. No. 11).

7 Good cause exists for the requested extension for the following reasons: Counsel for the  
8 Parties conferred by telephone on September 7, 2017. Defendants stated their position that,  
9 because Plaintiff asserts a securities-fraud claim brought under Section 10(b) of the Securities  
10 Exchange Act of 1934, the Private Securities Litigation Reform Act ("PSLRA") stays all discovery  
11 in this case during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). See 15  
12 U.S.C. § 78u-4(b)(3)(B). Plaintiff agreed to stipulate to a stay of discovery while the motions to  
13 dismiss are pending, without waiving any rights as to whether the PSLRA properly applies to this  
14 action or other proceedings.

15 In light of the foregoing, the Parties further stipulated and agreed that, if the Court denies  
16 the motions to dismiss in whole or in part, they will confer again and submit their Joint Status  
17 Report and Discovery Plan within 30 days after the order denying the motions in whole or in part.

18  
19 Dated: September 27, 2017

COOLEY LLP

20 By: /s/ Christopher B. Durbin

Christopher B. Durbin (No. 41159)

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24  
25  
26 Attorneys for Defendants TAMMER and JANE DOE  
FAHMY, HOWARD and JANE DOE LIPSON, ROSS and

27  
28 <sup>1</sup> The First Amended Complaint lists as additional defendants Jane Doe spouses and the marital  
communities for each Defendant.

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JANE DOE LUKATSEVICH, CRAIG and JANE DOE  
MALLITZ, PAUL and JANE DOE MCNICHOL, JOE and  
JANE DOE ROBINSON, ANDREW and JANE DOE  
RUSSELL, and MAYO and JANE DOE STUNTZ

DLA PIPER LLP (US)

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STIEGLITZ

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LLC

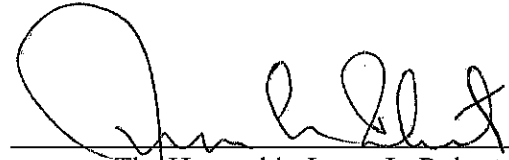
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**ORDER**

Pursuant to the Parties' stipulation, all discovery in this case is stayed during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). Within 30 days after an order denying the motions to dismiss in whole or in part, the Parties shall confer and file their Joint Status Report and Discovery Plan.

It is so ORDERED.

Dated: 28 September, 2017

  
\_\_\_\_\_  
The Honorable James L. Robart  
UNITED STATES DISTRICT JUDGE

*Presented by:*

/s/ Christopher B. Durbin  
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Jeffrey D. Lombard (No. 50260)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of September, 2017, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE JOINT STATUS REPORT AND DISCOVERY PLAN** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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*/s/ Christopher B. Durbin*  
Christopher B. Durbin

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