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Hon. James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NICOLETA SONERIU AND IOAN I.
SONERIU, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

YALNES, INC.; SERGEY A. PETROV;
PODY & MCDONALD, PLLC; PATRICK
M. MCDONALD; DEAN H. PODY; and
JOHN DOES 1-20,

Defendants.

No. 2:17-cv-00928-JLR

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO RESET THE
INITIAL DISCOVERY DATES

NOTED FOR HEARING:
JULY 18, 2017

I. STIPULATION

The Parties, through their respective counsel, hereby stipulates as follows:

1. On June 16, 2017, Plaintiff filed the Complaint in this matter. (Dkt 1).
2. On the last day of June, and first week of July 2017, counsel appeared for all defendants and waived formal service of the summons and complaint. (Dkt 5-8, 10-11).
3. Because of the waivers of service, the Defendants' Answers to the Complaint in this matter are not due to late August and early September.
4. On July 14, 2017, the Court entered an Order Regarding Initial Disclosures and Joint Status Report. (Dkt 12). The Rule 26(f) conference is currently set only about 14 days out and the remaining dates are set in the first part of August.

STIPULATION AND ORDER TO RESET INITIAL
DISCOVERY DATES - 1
2:17-cv-00928-JLR
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LEE SMART
P.S., Inc. - Pacific Northwest Law Offices
1800 One Convention Place • 701 Pike Street • Seattle • WA • 98101-3929
Tel. 206.624.7990 • Toll Free 877.624.7990 • Fax 206.624.5944

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5. The Parties have recently commenced discussing the potential for settlement prior to engaging in extended litigation, and believe that this case would benefit by having the initial discovery dates set back to September, since completing the initial discovery will be time consuming, potentially lead to disagreements as to the treatment in the reports, and cause additional expense that may make it more difficult to settlement the matter.

6. As such, the Parties request that the Court reset the initial discovery dates so that they fall in September, providing the parties with an opportunity to negotiate prior to having to expend considerable time and resources litigating the matter.

7. Counsel for some parties will also be out of the office the last week of August, and through Labor Day on September 4, 2017. Therefore, it is requested that the initial discovery dates commence after this date.

DATED this 18th day of July, 2017.

LAW OFFICE OF BORIS DAVIDOVSKIY, P.S.

By: /s Boris Davidovskiy
Boris Davidovskiy, WSBA No. 50593
Of Attorneys for Plaintiffs
Nicoleta and Ioan Soneriu

6100 219th Street SW, Suite 480
Mountlake Terrace, WA 98043
(425) 582-5200
boris@davidovskiy.com

LEE SMART, P.S., INC.

By: /s Marc Rosenberg
Marc Rosenberg, WSBA No. 31034
Of Attorneys for Defendants
Dean Pody, Patrick McDonald, and
Patrick & McDonald, PLLC

1800 One Convention Place
701 Pike Street
Seattle, WA 98101-3929
(206) 624-7990

STIPULATION AND ORDER TO RESET INITIAL
DISCOVERY DATES - 2

2:17-cv-00928-JLR
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LEE SMART

P.S., Inc. - Pacific Northwest Law Offices

1800 One Convention Place • 701 Pike Street • Seattle • WA • 98101-3929
Tel. 206.624.7990 • Toll Free 877.624.7990 • Fax 206.624.5944

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mr@leesmart.com

RYAN, SWANSON & CLEVELAND, PLLC

By: /s Jo M. Flannery

Jo M. Flannery, WSBA No. 26086
Of Attorneys for Defendants
Sergey Petrov and Yalnes, Inc.

1201 Third Ave, Suite 3400
Seattle, WA 98101-3034
(206) 464-4224
Flannery@ryanlaw.com


II. ORDER

THIS MATTER, having come before the Court on the Parties' Stipulation to Reset the Initial Discovery Dates, the Court having reviewed the pleadings and papers on file with the Court, and the Court being otherwise advised of the issues, it is HEREBY ORDERED that:

1. The Court's Initial Order Regarding Initial Disclosures and Joint ^{Status} ~~Statute~~ Report, (Dkt 12), is hereby stricken. *JWR*

2. The Court will issues a new Initial Order Regarding Initial Disclosures and Joint ^{Status} ~~Statute~~ Report setting the initial discovery dates after September 4, 2017. *JWR*

ENTERED this 18th day of July, 2017.



Hon. James L. Robart
U.S. District Court Judge