

The Honorable Marsha Pechman

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AIRLINE DIVISION,

and

AIRLINE PROFESSIONAL ASSOC. OF
THE INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, LOCAL UNION NO.
1224,

Plaintiffs,

v.

ALASKA AIR GROUP, INC.

and

HORIZON AIR INDUSTRIES, INC.

Defendants.

No. 2:17-cv-1327

STIPULATION AND ORDER

The parties respectfully file this stipulation and proposed order to (1) propose a schedule for submitting supplemental briefs on the pending motion to dismiss; (2) request a stay of the other deadlines in the current case schedule, pending resolution of the pending motion; and (3) request oral argument on the pending motion to dismiss.

STIPULATION AND ORDER - 1
2:17-cv-01327-MJP

1 **Recitals**

2 1. Plaintiffs filed their original complaint in this case on September 1, 2017, Dkt.
3 1, and their amended complaint on October 13, 2017. Dkt. 20.

4 2. Defendants moved to dismiss the amended complaint. Dkt. 27. Plaintiffs
5 opposed the motion and also moved to stay consideration of the motion pending the production
6 of discovery the Court had previously ordered. Dkt. 32 (discovery order), 44 (motion to stay),
7 51 (opposition to motion to dismiss).

8 3. The Court convened a status conference on February 1, 2018, to address the
9 management of discovery. Following the conference, the Court issued an order, dated February
10 6, 2018, regarding discovery and resolution of the pending motion to dismiss. Dkt. 67.

11 4. After Defendants produced additional documents, on March 28, 2018, Plaintiffs
12 took the deposition of Defendant AAG pursuant to Fed. R. Civ. P. 30(b)(6).

13 5. The parties expect to receive the transcript of that deposition on or around April
14 11, 2018. Upon receipt of the transcript, the parties will be prepared to submit the supplemental
15 briefing called for in the Court's February 6, 2018, order.

16 **Stipulation**

17 1. Plaintiffs shall file their supplemental opposition to Defendants' motion to
18 dismiss, not to exceed ten pages (exclusive of exhibits), by no later than May 4, 2018.
19 Defendants shall file their supplemental reply in support of their motion to dismiss, not to
20 exceed ten pages (exclusive of exhibits), by no later than May 18, 2018.

21 2. The parties jointly request oral argument on the motion to dismiss.

22 3. The parties request that the deadlines set forth in the Court's November 15,
23 2017, Order Setting Trial Date & Related Dates, Dkt. 38, be stayed pending resolution of the
24 pending motion to dismiss.

25 4. In the event that the Court does not dismiss the case in its entirety, the parties
26 shall confer within two weeks of the Court's order resolving the pending motion to dismiss to

1 discuss appropriate deadlines for trial and related dates. The parties shall then submit a joint
2 report to the Court within two weeks of their conference proposing a new case schedule.

3 DATED this 6th day of April, 2018.

4 /s/ Darin M. Dalmat
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1 SO ORDERED.

2 Dated: April 13, 2018

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6 Marsha J. Pechman
7 United States District Judge