

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

THUYHONG NGUYEN, an individual,

Plaintiff,

v.

CENTURYLINK, INC., a Louisiana
corporation,

Defendant.

NO. 2:17-cv-01341-RSL

JOINT STIPULATED MOTION
FOR RELIEF FROM DEADLINE
FOR INITIAL DISCLOSURES AND
JOINT STATUS REPORT AND
DISCOVERY PLAN

NOTE ON MOTION CALENDAR:
October 23, 2017.

The parties to this action, Plaintiff Thuy Nguyen and Defendant Centurylink, Inc. jointly and respectfully request that this Court modify its Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, Dkt. # 9. Good cause exists for relief from the deadline for initial disclosures and the combined joint status report and discovery plan. The parties request that the Court enter an order requiring initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on November 16, 2017 and that the parties file the joint status report and discovery plan on November 16, 2017.

The parties request that the Court extend the two deadlines as the extension will ensure that the parties are able to incorporate Defendant's answer and affirmative defenses into the initial disclosures and joint status report and discovery plan. The Defendant in this case waived service of the summons and complaint and instead, accepted service pursuant to FRCP 4.

JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 1

Case No. 2:17-cv-01341-RSL



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1 *Waiver of Service, Dkt. # 11.* Accordingly, Defendant's answer is not due until sixty days have
2 elapsed after the waiver was sent, or here, November 7, 2017. FRCP 4(d)(3). Both the
3 Plaintiff's claims as well as affirmative defenses raised by the Defendant should be considered
4 in formulating a complete final joint status report and discovery plan. An extension would
5 enable the parties to formulate a complete joint status report and discovery plan.

6 For the reasons stated above, the parties stipulate and jointly move the Court to
7 extend the deadline for initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on
8 November 16, 2017 and that the parties file the joint status report and discovery plan on
9 November 16, 2017.

10 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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October 23, 2017
Dated

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October 23, 2017
Dated

IT IS SO ORDERED.

DATED: Oct. 24, 2017 MTS Casnik
The Honorable Robert S. Lasnik
United States District Court
Western District of Washington