

Honorable Marsha Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOVANNA EDGE, an individual; LEAH HUMPHREY, an individual; LIBERTY ZISKA, an individual; AMELIA POWELL, an individual; NATALIE BJERKE, an individual; BRITTANY GIAZZI, an individual; JUANITA CASTANEDA GUERRERO, an individual; and MATTESON HERNANDEZ, an individual,

Plaintiffs,

v.

CITY OF EVERETT, a Washington Municipal Corporation,

Defendant.

No. 2:17-cv-01361

STIPULATION AND AGREED ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE

STIPULATION

The parties hereto, by and through their respective counsel, have conferred regarding an agreed briefing schedule on a Motion for Preliminary Injunction the Plaintiffs have stated they will file. The parties propose the following due dates:

Motion for Preliminary Injunction	Thursday, September 21, 2017
City's Response to Motion	Monday, October 23, 2017
Plaintiffs' Reply (noting date)	Friday, November 3, 2017

1 The parties respectfully request that the Court set a date for oral argument of the motion
2 as soon as reasonably possible following the noting date.

3 The parties agree that they have conducted an initial conference regarding discovery and
4 that the parties may conduct discovery with respect to this motion.

5 The parties also agree, in light of the injunction proceedings, to extend the date to answer
6 the complaint until October 30, 2017.

7 This stipulation is entered solely for the purpose of facilitating prompt and efficient
8 briefing and consideration of Plaintiffs' motion for the benefit of the Court and the parties
9 without the need for emergency motions practice. As part of this stipulation, the City will
10 voluntarily refrain from enforcement of Ordinance 3560-17 and the amendments in section 1 of
11 Ordinance 3559-17 until after this Court rules on the Motion for Preliminary Injunction.
12 Nothing in this stipulation will be construed as evidence of or an admission that any of Plaintiffs'
13 claims do or do not have merit, and no party may cite to this stipulation in aid of or in opposition
14 to any request for substantive relief, including any relief requested in the Motion for Preliminary
15 Injunction.

16 The parties, therefore, now stipulate to the foregoing and request that the Court enter the
17 Order subjoined hereto.

18 DATED this 15th day of September, 2017.

19 NEWMAN DU WORS LLP

PACIFICA LAW GROUP LLP

21 By s/Derek A. Newman

By s/ Matthew J. Segal

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Matthew J. Segal, WSBA #29797
CITY OF EVERETT
Ramsey Ramerman, WSBA #30423

Attorneys for Defendant City of Everett

25 *Attorneys for Plaintiffs*

1 **ORDER**

2 Based on the foregoing stipulation of the parties, the Court hereby ORDERS that the
3 Motion for Preliminary Injunction shall be subject to the following agreed briefing schedule:

4 Motion for Preliminary Injunction Thursday, September 21, 2017

5 City's Response to Motion Monday, October 23, 2017

6 Plaintiffs' Reply (noting date) Friday, November 3, 2017

7 The Court sets oral argument on the motion for preliminary injunction for November 21,
8 2017, at 10:00 a.m. The parties are allowed twenty minutes for argument, including rebuttal.

9 The parties may conduct discovery pursuant to their agreement.

10 The City shall file an answer to the complaint by October 30, 2017.

11 DATED this 18th day of September, 2017.

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16 Marsha J. Pechman
17 United States District Judge

18
19 Jointly Presented by:

20 PACIFICA LAW GROUP LLP

21 By /s/ Matthew J. Segal

22 Matthew J. Segal, WSBA #29797

23 *Attorneys for Defendant City of Everett*

24
25 CITY OF EVERETT

26 Ramsey Ramerman, WSBA #30423

27 STIPULATION AND PROPOSED AGREED ORDER
REGARDING MOTION FOR PRELIMINARY INJUNCTION
BRIEFING SCHEDULE - 3
Cause No. 2:17-cv-01361
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