

2  
4  
6  
8  
10  
12  
14  
16  
18  
20  
22  
24  
26  
28  
30  
32  
34  
36  
38  
40  
42  
44  
46  
48  
50  
52  
54  
56

The Honorable James L. Robart

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MACHELL SHERLES, Successor Executor  
and Trustee in the Estate of Ann R. Rule, King  
County , Washington Probate Cause No. 15-4-  
04420-3 KNT

Plaintiff,

v.

FOLEY AGENCY, Inc. et al,

Defendants.

**No. 2:18-cv-00016-JLR**

~~PROPOSED~~ STIPULATED ORDER  
GRANTING STIPULATED MOTION  
TO EXTEND TIME FOR  
DEFENDANTS' ANSWERS OR  
OTHER RESPONSIVE PLEADINGS

(Clerk's Action Required)

All parties to this action, consisting of Plaintiff, **Machell Sherles**, the Successor  
Executor and Trustee of the Rule Estate; and the Defendants, **Foley Agency, Inc.**, a New  
York corporation, and **JoAnn Fox**, a married individual ("Defendants"), via their  
Stipulated Motion to Extend Time for Defendants' Answers or Other Responsive Pleadings  
("Motion") stipulate to the entry of this Stipulated Order Granting Stipulated Motion to  
Extend Time for Defendants' Answers or Other Responsive Pleadings ("Order").

THEREFORE, IT IS SO ORDERED, ADJUDGED AND DECREED as follows:

[PROPOSED] STIPULATED ORDER GRANTING  
STIPULATED MOTION TO EXTEND TIME FOR  
DEFENDANTS' ANSWERS OR OTHER  
RESPONSIVE PLEADINGS - 1

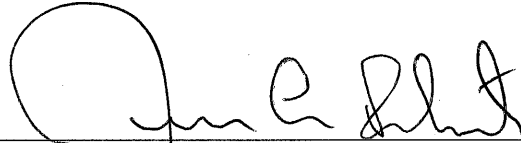
Foley Agency  
8-1-Proposed Stipulated Order Extend Time for Defendants Filing Answer.DOC

**COOK & BARTLETT, PLLC**  
*Attorneys at Law*  
1900 W. Nickerson St., Ste. 215  
Seattle, WA 98119  
Telephone: (206) 282-2710  
Facsimile: (206) 282-2707

2  
4  
6  
8  
10  
12  
14  
16  
18  
20  
22  
24  
26  
28  
30  
32  
34  
36  
38  
40  
42  
44  
46  
48  
50  
52  
54  
56

By agreement of the parties, Defendants' Answers or other responsive pleadings shall be filed on or before February 28, 2018.

SO ORDERED, this 6<sup>th</sup> day of February, 2018.



UNITED STATES DISTRICT COURT JUDGE

**SO STIPULATED AND AGREED:**

DATED this 5<sup>th</sup> day of February, 2018.

DATED this 5<sup>th</sup> day of February, 2018.

**Counsel for Plaintiff.**

**Counsel for Defendants.**

LYNCH & FOLEY PC

COOK & BARTLETT, PLLC

s/ Rex B. Stratton

/s/ Diana S. Hill

Rex B. Stratton, III, WSBA #1913; VBA #5683  
Attorney for Plaintiff  
7 Washington Street  
Middlebury, VT 05753  
T: (802) 388-7933  
F: (802) 388-9200  
[rstratton@lynchandfoley.com](mailto:rstratton@lynchandfoley.com)

Diana S. Hill, WSBA #36610  
Attorney for Defendants Foley Agency, Inc.  
and JoAnn Fox  
1900 W. Nickerson St., Ste. 215  
Seattle, WA 98119  
T: (206) 282-2710  
F: (206) 282-2707  
[dhill@cookandbartlett.com](mailto:dhill@cookandbartlett.com)

////

////

////

[PROPOSED] STIPULATED ORDER GRANTING  
STIPULATED MOTION TO EXTEND TIME FOR  
DEFENDANTS' ANSWERS OR OTHER  
RESPONSIVE PLEADINGS - 2

**COOK & BARTLETT, PLLC**  
*Attorneys at Law*  
1900 W. Nickerson St., Ste. 215  
Seattle, WA 98119  
Telephone: (206) 282-2710  
Facsimile: (206) 282-2707

2  
4  
6  
8  
10  
12  
14  
16  
18  
20  
22  
24  
26  
28  
30  
32  
34  
36  
38  
40  
42  
44  
46  
48  
50  
52  
54  
56

**Certificate of Service**

I hereby certify that on February 5, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record for Plaintiff:

Rex B. Stratton, III  
Lynch & Foley PC  
7 Washington Street  
Middlebury, VT 05753  
[rstratton@lynchandfoley.com](mailto:rstratton@lynchandfoley.com)

This 5<sup>th</sup> day of February, 2018 at Seattle, Washington.

/s/ Diana S. Hill  
\_\_\_\_\_  
Diana S. Hill  
Cook & Bartlett, PLLC  
1900 W. Nickerson St., Ste. 215  
Seattle, WA 98119  
T: (206) 282-2710

[PROPOSED] STIPULATED ORDER GRANTING  
STIPULATED MOTION TO EXTEND TIME FOR  
DEFENDANTS' ANSWERS OR OTHER  
RESPONSIVE PLEADINGS - 3

**COOK & BARTLETT, PLLC**  
*Attorneys at Law*  
1900 W. Nickerson St., Ste. 215  
Seattle, WA 98119  
Telephone: (206) 282-2710  
Facsimile: (206) 282-2707