

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 DEADLINES FOR  
INITIAL DISCLOSURES &  
COMBINED JOINT STATUS  
REPORT AND DISCOVERY PLAN

(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, via their Stipulated Motion to  
Extend Deadlines for Initial Disclosures & Combined Joint Status Report and Discovery  
Plan ("Motion") stipulate to the entry of this Stipulated Order Granting Stipulated Motion  
to Extend Deadlines for Initial Disclosures & Combined Joint Status Report and Discovery  
Plan ("Order").

[PROPOSED] STIPULATED ORDER GRANTING  
STIPULATED MOTION TO EXTEND DEADLINES  
FOR INITIAL DISCLOSURES & COMBINED JOINT  
STATUS REPORT AND DISCOVERY PLAN - 1

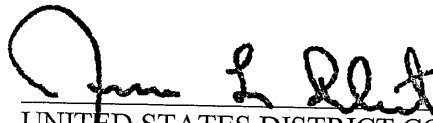
Foley Agency  
11-1-Proposed Stipulated Order Extend Deadline for Initial Disclosures & JSR.DOC

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

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

By agreement of the parties and for good cause shown, the deadline for FRCP 26(a)(1) Initial Disclosures shall be April 2, 2018, and the deadline for FRCP 26(f) and Local Civil Rule 26(f) Combined Joint Status Report and Discovery Plan shall be April 9, 2018. The deadline for FRCP 26(f) Conference shall remain unchanged.

SO ORDERED, this 9<sup>th</sup> day of February, 2018.

  
UNITED STATES DISTRICT COURT JUDGE

**SO STIPULATED AND AGREED:**

DATED this 8<sup>th</sup> day of February, 2018.

DATED this 8<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 DEADLINES  
FOR INITIAL DISCLOSURES & COMBINED JOINT  
STATUS REPORT AND DISCOVERY PLAN - 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 8, 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 8<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 DEADLINES  
FOR INITIAL DISCLOSURES & COMBINED JOINT  
STATUS REPORT AND DISCOVERY PLAN - 3

Foley Agency  
11-1-Proposed Stipulated Order Extend Deadline for Initial Disclosures & JSR.DOC

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