Case 2:18-cv-00090-RSL Document 22 Filed 02/23/18 Page 1 of 5

The Honorable Robert S. Lasnik

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WASHINGTON AT SEATTLE

JEREMY CONKLIN, D.O., an individual,

UNIVERSITY OF WASHINGTON

NO. 2:18-cv-00090-RSL

Plaintiff, 10

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MEDICINE, a Washington public health system; UW MEDICINE/NW, a Washington public benefit corporation; UNIVERSITY OF WASHINGTON MEDICAL CENTER, a Washington public hospital; UNIVERSITY OF WASHINGTON SCHOOL OF MEDICINE, a Washington public educational institution; PAUL RAMSEY, M.D., in his official capacity and individually; LESTER PERMUT, M.D., in his official capacity and individually; SEATTLE CHILDREN'S

HOSPITAL, a Washington non-profit corporation; CHILDREN'S UNIVERSITY MEDICAL GROUP, a Washington pediatric

group; MARY BRIDGE CHILDREN'S 21 FOUNDATION, a Washington public benefit

corporation; AMERICAN BOARD OF 22

THORACIC SURGERY, INC., an Illinois 23

non-profit corporation; THORACIC SURGERY DIRECTORS ASSOCIATION, 24

INC., a North Carolina non-profit

corporation; and ACCREDITATION COUNCIL FOR GRADUATE MEDICAL

STIPULATION AND [PROPOSED]

ORDER EXTENDING TIME FOR THORACIC SURGERY DIRECTORS ASSOCIATION TO FILE RESPONSIVE

PLEADING (2:18-cv-00090-RSL)

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT THORACIC SURGERY DIRECTORS ASSOCIATION, INC. TO FILE RESPONSIVE PLEADING

NOTE ON MOTION CALENDAR: February 23, 2018

> **Betts** Patterson Mines One Convention Place Suite 1400 701 Pike Street Seattle, Washington 98101-3927

Stipulation and Proposed Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading docx/022318 1631/9998

EDUCATION, an Illinois non-profit 1 corporation, 2 Defendants. 3 Defendant Thoracic Surgery Directors Association, Inc. ("TSDA") and Plaintiff Jeremy 4 Conklin, D.O., by and through their counsel of record, hereby stipulate and agree that the 5 deadline for Defendant TSDA to file a responsive pleading be extended to April 2, 2018 and 6 request that the Court enter the proposed order consistent with this stipulation. 7 8 Respectfully submitted this 23rd day of Respectfully submitted this 23rd day of February, 2018. February, 2018. 9 HKM EMPLOYMENT ATTORNEYS, LLP BETTS, PATTERSON & MINES, P.S. 10 By/s/Kristi Favard [per email authorization] By/s/James D. Nelson 11 Kristi Favard, WSBA #34419 By/s/Shaina R. Johnson 12 HKM Employment Attorneys, LLP By/s/Natalie A. Moore 600 Stewart Street, Ste. 901 James D. Nelson, WSBA #11134 13 Seattle, WA 98101 Shaina R. Johnson, WSBA #46079 (206) 838-2504 Tel.: Natalie A. Moore, WSBA #45333 14 Fax: (206) 260-3055 Betts, Patterson & Mines P.S. E-mail: kfavard@hkm.com One Convention Place, Suite 1400 15 Attorneys for Plaintiff 701 Pike Street 16 Seattle, WA 98101-3927 Tel.: (206) 292-9988 17 Fax: (206) 343-7053 E-mail: jnelson@bpmlaw.com 18 E-mail: sjohnson@bpmlaw.com E-mail: nmoore@bpmlaw.com 19 Attorneys for Defendant Thoracic Surgery 20 Directors Association, Inc. 21 22 23 24 25 **Betts** STIPULATION AND (PROPOSED) Patterson ORDER EXTENDING TIME FOR Mines THORACIC SURGERY DIRECTORS One Convention Place

(206) 292-9988

Stipulation and [Preposed] Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading.docx/022318 1631/9998-0043

ASSOCIATION TO FILE RESPONSIVE

PLEADING (2:18-cv-00090-RSL)

Suite 1400

701 Pike Street

Seattle, Washington 98101-3927

**ORDER** 2 IT IS SO ORDERED. DATED this (> 3 4 5 6 Lodged by: 7 BETTS, PATTERSON & MINES, P.S. 8 By/s/James D. Nelson By/s/Shaina R. Johnson By/s/Natalie A. Moore James D. Nelson, WSBA #11134 10 Shaina R. Johnson, WSBA #46079 11 Natalie A. Moore, WSBA #45333 Betts, Patterson & Mines P.S. 12 One Convention Place, Suite 1400 701 Pike Street 13 Seattle, WA 98101-3927 14 Telephone: (206) 292-9988 Facsimile: (206) 343-7053 15 E-mail: jnelson@bpmlaw.com E-mail: sjohnson@bpmlaw.com 16 E-mail: nmoore@bpmlaw.com Attorneys for Defendant Thoracic Surgery 17 Directors Association, Inc. 18 Approved for entry by: 19 HKM EMPLOYMENT ATTORNEYS, LLP 20 By/s/Kristi Favard [per email authorization] Kristi Favard, WSBA #34419 21 HKM Employment Attorneys, LLP 22 600 Stewart Street, Ste. 901 Seattle, WA 98101 23 Tel.: (206) 838-2504 Fax: (206) 260-3055 24 E-mail: kfavard@hkm.com 25 Attorneys for Plaintiff Betts STIPULATION AND (PROPOSED) Patterson ORDER EXTENDING TIME FOR Mines THORACIC SURGERY DIRECTORS One Convention Place Suite 1400 ASSOCIATION TO FILE RESPONSIVE 701 Pike Street PLEADING (2:18-cv-00090-RSL) Seattle, Washington 98101-3927 Stipulation and Proposed Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading.docx/022318 1631/9998-