(No. 2:18-cv-00188-RSM)

1 The Honorable Ricardo Martinez 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 FOR THE WESTERN DISTRICT OF WASHINGTON 9 JACOB STRUIKSMA, Case No. 2:18-cv-00188-RSM 10 Plaintiff, SECOND STIPULATION TO EXTEND TIME TO ANSWER PLAINTIFF'S 11 VS. **COMPLAINT** 12 ZONES, INC., a Washington Corporation and APOLLO PROFESSIONAL SOLUTIONS, 13 INC., 14 Defendant. 15 16 **STIPULATION** 17 The parties hereby file this second stipulated motion pursuant to LCR 7(d)(1) and LCR 18 10(g) to extend the deadline for Defendants to respond to Plaintiff's Complaint, which was filed 19 in this Court on February 6, 2018 (Dkt. #1). The current deadline for Defendants' responses is 20 March 30, 2018 (Dkt. #11). 21 The parties are continuing to confer regarding the possibility of an early negotiated 22 settlement of this dispute, and would prefer to focus their time and resources to such discussions 23 with the hope that a resolution of this matter might be possible without turning to the Court for 24 assistance. 25 The parties, therefore, join in respectfully asking the Court to extend the deadline for 26 Defendants to file and serve their respective Answers to Plaintiff's Complaint from the current SECOND STIPULATION TO EXTEND TIME OGLETREE, DEAKINS, NASH, SMOAK & STEWART, TO ANSWER PLAINTIFF'S COMPLAINT -800 Fifth Avenue, Suite 4100 | Seattle, WA 98104 Phone: 206-693-7057 | Fax: 206-693-7058

1	deadline of March 30, 2018 to a new deadline of April 30, 2018.	
2		
3	Dated: April 30, 2018	
4		
5	LABARRE LAW OFFICES, P.C.	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
6	/s/ Scott LaBarre.(with	/s/ Laurence A. Shapero
7	permission)	Laurence A. Shapero, WSBA #31301
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23	Attorneys for Apollo Professional Solutions,	
24	Inc.	
25		
26		

SECOND STIPULATION TO EXTEND TIME TO ANSWER PLAINTIFF'S COMPLAINT - 2

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OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

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1 2 **ORDER** 3 Pursuant to the parties' stipulated request for such relief, the due date for Defendants to 4 file their respective Answers to Plaintiff's Complaint is extended to April 30, 2018. 5 DATED this 3 day of April 2018. 6 7 8 9 RICARDO S. MARTINEZ 10 CHIEF UNITED STATES DISTRICT JUDGE 11 Presented By: 12 OGLETREE, DEAKINS, NASH, SMOAK 13 & STEWART, P.C. 14 15 /s/ Laurence A. Shapero Laurence A. Shapero, WSBA #31301 16 Attorneys for Zones, Inc. 17 18 LABARRE LAW OFFICES, P.C. 19 /s/ Scott LaBarre (with permission) Scott LaBarre, admitted pro hac vice 20 /s/ Conrad Reynoldson (with permission) 21 Conrad Reynoldson, WSBA #48187 22 Washington Civil and Disability 23 Attorneys for Plaintiff 24 25 NORTHCRAFT, BIGBY & BIGGS, P.C. 26 /s/ Aaron D. Bigby (with permission) Aaron D. Bigby, WSBA # 29271 SECOND STIPULATION TO EXTEND TIME OGLETREE, DEAKINS, NASH, SMOAK & STEWART, TO ANSWER PLAINTIFF'S COMPLAINT -800 Fifth Avenue, Suite 4100 | Seattle, WA 98104

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