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, THIRD STIPULATED MOTION AND ORDER TO EXTEND DEADLINES 11 VS. 12 ZONES, INC., a Washington Corporation and APOLLO PROFESSIONAL SOLUTIONS, 13 INC., 14 Defendant. 15 16 **STIPULATION** 17 The parties hereby file this third 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, FRCP 26(f) 19 Conference, Initial Disclosures Pursuant to FRCP 26(a)(1), and Combined Joint Status Report & 20 Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f). The court orders (Dkt. 21 #14, 16) set the deadlines as follows: 22 Defendants Answers to Plaintiff's Complaint: April 30, 2018 23 FRCP 26(f) Conference: April 9, 2018 24 Initial Disclosures Pursuant to FRCP 26(a)(1): April 16, 2018 Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local 25 Civil Rule 26(f): April 23, 2018 26 The parties currently have mediation scheduled for May 17, 2018 and would prefer to OGLETREE, DEAKINS, NASH, SMOAK & STEWART, THIRD STIPULATED MOTION AND ORDER TO EXTEND DEADLINES - 1 800 Fifth Avenue, Suite 4100 | Seattle, WA 98104 (No. 2:18-cv-00188-RSM)

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1	focus their time and resources to prepare with the hope that a resolution of this matter might be	
2	possible without turning to the Court for assistance.	
3	The parties therefore join in respectfully asking the Court to extend the deadlines as	
4	follows:	
5	Defendants' Answers to Plaintiff's Complaint: June 1, 2018	
6	FRCP 26(f) Conference: June 11, 2018	
7	Initial Disclosures Pursuant to FRCP 26(a)(1): June 18, 2018	
8	Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Loca Civil Rule 26(f): June 25, 2018	
9	Civil Rule 20(1). Julie 23, 2010	
10	Dated: April 17, 2018	
11	LABARRE LAW OFFICES, P.C.	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
12		
13	/s/ Scott LaBarre.(with permission)	/s/ Laurence A. Shapero Laurence A. Shapero, WSBA #31301
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17		Email: laurence.shapero@ogeltree.com
18	/s/ Conrad Reynoldson (with permission) Conrad Reynoldson, WSBA #48187	Attorney for Zones, Inc.
19	Washington Civil and Disability	
20	3513 NE 45th St., Suite G Seattle, WA 98105	NORTHCRAFT, BIGBY & BIGGS, P.C.
20	206-855-3134	/s/ Aaron D. Bigby (with permission)
21	Email: conrad@wacda.com	Aaron D. Bigby, WSBA # 29271
22		Northcraft, Bigby &Biggs, P.C.
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25		Attorneys for Apollo Professional Solutions, Inc.
26		

THIRD STIPULATED MOTION AND ORDER TO EXTEND DEADLINES - 2 (No. 2:18-cv-00188-RSM)

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1 **ORDER** 2 Pursuant to the parties' stipulated request for such relief, the court extends the deadlines 3 as follows: 4 Defendants' Answers to Plaintiff's Complaint: June 1, 2018 5 FRCP 26(f) Conference: June 11, 2018 Initial Disclosures Pursuant to FRCP 26(a)(1): June 18, 2018 6 Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local 7 Civil Rule 26(f): June 25, 2018 8 DATED this 18 day of April, 2018. 9 10 11 CHIEF UNITED STATES DISTRICT JUDGE 12 Presented By: OGLETREE, DEAKINS, NASH, SMOAK 13 & STEWART, P.C. 14 /s/ Laurence A. Shapero 15 Laurence A. Shapero, WSBA #31301 Attorneys for Zones, Inc. 16 17 LABARRE LAW OFFICES, P.C. 18 /s/ Scott LaBarre (with permission) Scott LaBarre, admitted pro hac vice 19 20 /s/ Conrad Reynoldson (with permission) Conrad Reynoldson, WSBA #48187 21 Washington Civil and Disability 22 Attorneys for Plaintiff 23 NORTHCRAFT, BIGBY & BIGGS, P.C. 24 25 /s/ Aaron D. Bigby (with permission) Aaron D. Bigby, WSBA # 29271 26 Attorneys for Apollo Professional Solutions, Inc.

THIRD STIPULATED MOTION AND ORDER TO EXTEND DEADLINES - 3 (No. 2:18-cv-00188-RSM)

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