

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Case No.: 18-cv-00910 RSM

CITY OF ISSAQUAH, a municipal corporation,

Plaintiff,

v.

ORA TALUS 90, LLC, a Delaware limited liability company; and RESMARK EQUITY PARTNERS, LLC, a Delaware limited liability company

Defendant.

**STIPULATED MOTION AND ORDER TO EXTEND CERTAIN DEADLINES**

In order to conserve resources, accommodate an imminent scheduling conflict<sup>1</sup>, and to facilitate the orderly management of this case, the parties respectfully submit this joint request for an Order to Extend Certain Deadlines pursuant to LCR 16(b)(5).

Counsel for the defendants have advised plaintiff’s counsel of their intent to file an amended answer and counterclaim and to bring additional parties into the case by way of a third-party complaint and as additional defendants on the counterclaim. Based upon the

<sup>1</sup> Plaintiff’s counsel has agreed to the request which arises in part from Defendants’ counsel’s pre-existing conflicts in other matters, including an appellate filing and a complex mediation and briefing.

1 existing deadlines and other obligations, the parties jointly request that the Court extend certain  
2 of the case deadlines, which will allow the parties to conduct the Rule 26(f) conference, serve  
3 Initial Disclosures, and submit a Joint Status Report once all parties have appeared in the case.

4 Accordingly, the parties seek extension of the following deadlines:

5 **Service of Summons and Complaint on a Nonparty by Defendants**

6 Current deadline: August 6, 2018 (*see* Fed. R. Civ. P. 14(a)(1))

7 Requested deadline: September 6, 2018

8  
9 **Service and Filing of an Amended Answer and Counterclaim by Defendants**

10 Current deadline: August 13, 2018 (*see* Fed. R. Civ. P. 15(a)(1))

11 Requested deadline: September 6, 2018

12  
13 **Fed. R. Civ. P. 26(f) Conference**

14 Current deadline: August 3, 2018 (*see* Dkt. # 7)

15 Requested deadline: September 20, 2018

16  
17 **Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

18 Current deadline: August 10, 2018 (*see* Dkt. # 7)

19 Requested deadline: September 27, 2018

20  
21 **Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P.  
22 26(f) and Local Civil Rule 26(f)**

23 Current deadline: August 3, 2018 (*see* Dkt. # 7)

24 Requested deadline: September 20, 2018

1  
2 The parties respectfully request the foregoing relief.

3 DATED this 1st day of August, 2018

4 SKELLENGER BENDER, P.S.

HARRIGAN LEYH FARMER & THOMSEN LLP

5 By: s/Terence J. Scanlan

By: s/Arthur W. Harrigan, Jr.

6 By: s/Patricia A. Robert

By: s/Tyler L. Farmer

7 Terence J. Scanlan, WSBA #19498

By: s/Kristin E. Ballinger

8 Patricia A. Robert, WSBA # 46716

Arthur W. Harrigan, Jr. WSBA #1751

9 1301 – 5th Avenue, Suite 3401

Tyler L. Farmer, WSBA #39912

10 Seattle, WA 98101-2605

Kristin E. Ballinger, WSBA #28253

11 Telephone: 206-623-6501

999 Third Avenue, Suite 4400

12 Facsimile: 206-447-1973

Seattle, WA 98104

13 Email:

Telephone: (206) 623-1700

14 [tscanlan@skellengerbender.com](mailto:tscanlan@skellengerbender.com)

Facsimile: (206) 623-8717

15 Email:

Email: [arthurh@harriganleyh.com](mailto:arthurh@harriganleyh.com)

16 [probert@skellengerbender.com](mailto:probert@skellengerbender.com)

Email: [tylerf@harriganleyh.com](mailto:tylerf@harriganleyh.com)

Email: [kristinb@harriganleyh.com](mailto:kristinb@harriganleyh.com)

17 Attorneys for Plaintiff City of Issaquah

18 GLASER WEIL FINK HOWARD AVCHEN &  
19 SHAPIRO LLP

20 By: s/Cynthia M. Cohen

21 Cynthia M. Cohen, Admitted Pro Hac Vice

22 333 S. Hope Street, Suite 2610

23 Los Angeles, CA 90071

24 Telephone: (310) 553-3000

Facsimile: (310) 556-2920

Email: [ccohen@glaserweil.com](mailto:ccohen@glaserweil.com)

Attorneys for Defendants ORA Talus 90, LLC and  
Resmark Equity Partners, LLC

**ORDER**

IT IS SO ORDERED.

DATED this 2nd day of August, 2018.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

SKELLENGER BENDER, P.S.

HARRIGAN LEYH FARMER & THOMSEN LLP

By: s/Terence J. Scanlan

By: s/Arthur W. Harrigan, Jr.

By: s/Patricia A. Robert

By: s/Tyler L. Farmer

Terence J. Scanlan, WSBA #19498

By: s/Kristin E. Ballinger

Patricia A. Robert, WSBA # 46716

Arthur W. Harrigan, Jr. WSBA #1751

1301 – 5th Avenue, Suite 3401

Tyler L. Farmer, WSBA #39912

Seattle, WA 98101-2605

Kristin E. Ballinger, WSBA #28253

Telephone: 206-623-6501

999 Third Avenue, Suite 4400

Facsimile: 206-447-1973

Seattle, WA 98104

Email:

Telephone: (206) 623-1700

[tscanlan@skellengerbender.com](mailto:tscanlan@skellengerbender.com)

Facsimile: (206) 623-8717

Email:

Email: [arthurh@harriganleyh.com](mailto:arthurh@harriganleyh.com)

[probert@skellengerbender.com](mailto:probert@skellengerbender.com)

Email: [tylerf@harriganleyh.com](mailto:tylerf@harriganleyh.com)

Email: [kristinb@harriganleyh.com](mailto:kristinb@harriganleyh.com)

Attorneys for Plaintiff City of Issaquah

GLASER WEIL FINK HOWARD AVCHEN &  
SHAPIRO LLP

By: s/Cynthia M. Cohen

Cynthia M. Cohen, Admitted Pro Hac Vice

333 S. Hope Street, Suite 2610

Los Angeles, CA 90071

Telephone: (310) 553-3000

Facsimile: (310) 556-2920

Email: [ccohen@glaserweil.com](mailto:ccohen@glaserweil.com)

Attorneys for Defendants ORA Talus 90, LLC and  
Resmark Equity Partners, LLC