

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.: C18-910 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

The parties respectfully submit this joint request for an Order to Extend Certain Deadlines pursuant to LCR 16(b)(5).

The parties have agreed to mediate all issues in dispute between the parties to this lawsuit and third parties who will be brought into the case before Christopher J. Soelling on October 24, 2018. The parties believe that it would be most efficient to extend certain deadlines so that they may focus on the mediation rather than the demands of initial disclosures and the discovery conference. In addition, the defendants seek more time to file their amended answer,

1 third-party complaint, and counterclaim in order to coordinate that filing with certain other third
2 parties that have subrogation rights.

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

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

5 Current deadline: September 6, 2018

6 Requested deadline: September 26, 2018

7
8 **Service and Filing of an Amended Answer and Counterclaim by Defendants**

9 Current deadline: September 6, 2018

10 Requested deadline: September 26, 2018

11
12 **Fed. R. Civ. P. 26(f) Conference**

13 Current deadline: September 20, 2018

14 Requested deadline: October 31, 2018

15
16 **Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

17 Current deadline: September 27, 2018

18 Requested deadline: November 7, 2018

19
20 **Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P.
21 26(f) and Local Civil Rule 26(f)**

22 Current deadline: September 20, 2018

23 Requested deadline: October 31, 2018

1 The parties respectfully request the foregoing relief.

2 DATED this 28th day of August, 2018

3 SKELLENGER BENDER, P.S.

HARRIGAN LEYH FARMER & THOMSEN LLP

4 By: s/Terence J. Scanlan

By: s/Arthur W. Harrigan, Jr.

5 By: s/Patricia A. Robert

By: s/Tyler L. Farmer

6 Terence J. Scanlan, WSBA #19498

By: s/Kristin E. Ballinger

7 Patricia A. Robert, WSBA # 46716

Arthur W. Harrigan, Jr. WSBA #1751

8 1301 – 5th Avenue, Suite 3401

Tyler L. Farmer, WSBA #39912

9 Seattle, WA 98101-2605

Kristin E. Ballinger, WSBA #28253

10 Telephone: 206-623-6501

999 Third Avenue, Suite 4400

11 Facsimile: 206-447-1973

Seattle, WA 98104

12 Email:

Telephone: (206) 623-1700

13 tscanlan@skellengerbender.com

Facsimile: (206) 623-8717

14 Email:

Email: arthurh@harriganleyh.com

15 probert@skellengerbender.com

Email: tylerf@harriganleyh.com

Email: kristinb@harriganleyh.com

16 Attorneys for Plaintiff City of Issaquah

17 GLASER WEIL FINK HOWARD AVCHEN &
18 SHAPIRO LLP

19 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

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

ORDER

IT IS SO ORDERED this 29th 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
Patricia A. Robert, WSBA # 46716
1301 – 5th Avenue, Suite 3401
Seattle, WA 98101-2605
Telephone: 206-623-6501
Facsimile: 206-447-1973

Arthur W. Harrigan, Jr. WSBA #1751
Tyler L. Farmer, WSBA #39912
Kristin E. Ballinger, WSBA #28253
999 Third Avenue, Suite 4400
Seattle, WA 98104

Email:
tscanlan@skellengerbender.com
Email:
probert@skellengerbender.com

Telephone: (206) 623-1700
Facsimile: (206) 623-8717
Email: arthurh@harriganleyh.com
Email: tylerf@harriganleyh.com
Email: 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

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