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Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MARK HOLADAY,  
  
Plaintiff,  
  
v.  
  
KEYBANK N.A.,  
  
Defendant.

Case No. 19-cv-01199-RSM  
  
STIPULATED MOTION TO AMEND  
DISCOVERY MOTIONS DEADLINE  
  
Noted for Hearing: 7/13/21 (w/o oral  
argument)

Plaintiff Mark Holaday and defendant KeyBank NA are cooperating and anticipate wrapping up discovery without asking the Court to get involved. But the discovery motions deadline is currently scheduled for July 15, 2021, and there is still a bit more work to do. The parties request an extension of that deadline until August 12, 2021.

The Court may modify a deadline in its pretrial order for good cause. FRCP 16(b)(4); *see also Nikfard v. State Farm Fire & Cas. Co.*, 2020 WL 6491368, at \*1 (W.D. Wash. Oct. 6, 2020). An extension of the discovery motions deadline prevents either party from filing an unnecessary motion merely to preserve its rights while they continue to cooperate. And because all other pretrial deadlines and trial dates would remain the same, resolution of this case will not be further delayed. For those reasons, good cause exists for the extension.

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: July 13, 2021


s/ Setareh Mahmoodi  
Setareh Mahmoodi, WSBA No. 44288  
Attorney for Plaintiff

DATED: July 13, 2021

s/Kellen A. Hade  
Kellen A. Hade, WSBA No. 44535  
Attorney for Defendant

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: July 15, 2021

  
Ricardo S. Martinez  
Chief United States District Court Judge

4853-1308-0561.1