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THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Adrianna Killam,

Plaintiff,

v.

Port of Seattle,

Defendant.

Case No.: 2:20-cv-00432-RSM

STIPULATION AND ORDER FOR
STAY OF CASE UNTIL JULY 6, 2020
PENDING SETTLEMENT
NEGOTIATIONS

NOTED FOR CONSIDERATION:
June 3, 2020

I. STIPULATION

Plaintiff Adrianna Killam filed her Complaint on March 20, 2020 (Dkt. # 1). On May 8, 2020, the Court ordered a stay of all deadlines in this case until June 5, 2020 (Dkt. #6). The Parties have participated in settlement discussions and agree that an additional stay of this case until July 6, 2020 is appropriate.

This additional extension of time will permit the Parties to continue to engage in settlement discussions that have already commenced and potentially resolve this matter without further action by the Court. The Parties believe that these settlement efforts will be compromised

1 by simultaneous prelitigation civil filings and practice and that there is good cause for the stay
2 requested. Representative counsel for the parties agreed to extending the stay during a telephone
3 conference and related e-mail correspondence on Monday, June 1, 2020.

4 Thus, the Parties respectfully request the Court to enter an Order:

- 5 i. Staying this action for all purposes until July 6, 2020, so that the Parties can focus
- 6 on and conduct settlement negotiations; and
- 7 ii. Scheduling a status hearing date for the Parties to file a joint report, or other event
- 8 that will permit the Parties to update the Court on the progress of settlement
- 9 efforts following the conclusion of the stay on July 6, 2020.

10
11 EXECUTED at Seattle, WA, this 3rd day of June, 2020.

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13 STOKES LAWRENCE, P.S.

WASHINGTON CIVIL AND DISABILITY
ADVOCATE

14
15 By: /s/ Justo G. Gonzalez
Justo G. Gonzalez (WSBA #39127)

By: /s/ Conrad Reynoldson
Conrad Reynoldson (WSBA #48187)

16
17 By: /s/ Joshua D. Harms
Joshua D. Harms (WSBA #55679)

By: /s/ Jill Sulzberg
Jill Sulzberg (WSBA # 55946)

18 Stokes Lawrence, P.S.
19 1420 Fifth Avenue, Suite 3000
Seattle, WA 98101-2393
20 Telephone: (206) 626-6000
Fax: (206) 464-1496
E-mail: JGG@stokeslaw.com
21 E-mail: JDH@stokeslaw.com

Washington Civil and Disability Advocate
4115 Roosevelt Way NE, Ste B
Seattle, WA 98105
Telephone: (206) 876-8515
Fax: (206) 876-8515
E-mail: conrad@wacda.com
E-mail: jill@wacda.com

22 Attorneys for Defendant Port of Seattle

Attorneys for Plaintiff Adrianna Killiam

ORDER

Based on the foregoing Stipulation and Motion, IT IS SO ORDERED that Defendant's deadline to file a responsive pleading is extended to July 6, 2020. The parties are directed to file a joint status report no later than July 2, 2020, indicating:

- 1) Whether the stay should be lifted or extended;
- 2) The agreed date upon which Defendant's responsive pleading is due; and
- 3) Proposed dates for the Court to reset deadlines for the FRCP 26(f) conference, initial disclosures, and a combined joint status report and discovery plan.

DATED this 3rd day of June, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

STOKES LAWRENCE, P.S.

By: /s/ Justo G. Gonzalez
Justo G. Gonzalez (WSBA #39127)

By: /s/ Joshua D. Harms
Joshua D. Harms (WSBA #55679)

Attorneys for Defendant Port of Seattle

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WASHINGTON CIVIL AND DISABILITY ADVOCATE

By: /s/ Conrad Reynoldson
Conrad Reynoldson (WSBA #48187)

By: /s/ Jill Sulzberg
Jill Sulzberg (WSBA # 55946)

Attorneys for Plaintiff Adrianna Killiam