Killam v. Por			
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1	THE HONORABLE RICARDO S. MARTINEZ		
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7	LINITED STATES DI	STRICT COURT	
8	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON		
9	AT SEAT	TLE	
	Adrianna Killam,		
10	Plaintiff,	Case No.: 2:20-cv-00432-RSM	
11		STIPULATION AND ORDER FOR STAY OF CASE UNTIL AUGUST 17,	
12	V.	2020 PENDING SETTLEMENT	
13	Port of Seattle,	NEGOTIATIONS	
	Defendant.	NOTED FOR CONSIDERATION:	
14		July 27, 2020	
15			
16	I. STIPULATION		
17	Plaintiff Adrianna Killam filed her Complaint on March 20, 2020 (Dkt. # 1). On May 8,		
18	2020, the Court ordered a stay of all deadlines in this case until June 5, 2020 (Dkt. #6). On June		
19	3, 2020, the Court ordered a second stay of all deadlines in this case until July 6, 2020 (Dkt. 11).		
20	On July 1, 2020, the Court reset deadlines pursuant to joint request of counsel, while parties		
21	continue settlement negotiations. The Parties are participating in ongoing settlement discussions		
22	and agree that an additional stay of this case until August 17th, 2020 is appropriate.		
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24			
	STIPULATION AND ORDER FOR STAY OF CASE UNTIL PENDING SETTLEMENT NEGOTIATIONS - 1 2:20-cv-00432-RSM	L AUGUST 17, 2020 STOKES LAWRENCE, P.S. 1420 FIFTH AVENUE, SUITE 3000 SEATTLE, WASHINGTON 98101-2393 (206) 626-6000	

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1	This additional extension of time will permit	the Parties to continue to engage in	
2	settlement discussions and potentially resolve this matter without further action by the Court.		
3	The Parties believe that these settlement efforts will be compromised by simultaneous		
4	prelitigation civil filings and practice and that there is good cause for the stay requested.		
5	Representative counsel for the parties agreed to extending the stay during related e-mail		
6	correspondence on Monday, July 27, 2020.		
7	Thus, the Parties respectfully request that the Court enter an Order staying this action for		
8	all purposes until August 17th, 2020, so that the Parties can focus on and conduct settlement		
9	negotiations and potentially resolve this case.		
10			
11	EXECUTED at Seattle, WA, this 27th day of	f July, 2020.	
12			
13	STOKES LAWRENCE, P.S.	WASHINGTON CIVIL AND DISABILITY ADVOCATE	
14	By: /s/ Justo G. Gonzalez	By: /s/ Conrad Reynoldson	
15	Justo G. Gonzalez (WSBA #39127)	Conrad Reynoldson (WSBA #48187)	
16	By: /s/ Joshua D. Harms	By: /s/ Jill Sulzberg	
17	Joshua D. Harms (WSBA #55679)	Jill Sulzberg (WSBA # 55946)	
18	Stokes Lawrence, P.S. 1420 Fifth Avenue, Suite 3000	Washington Civil and Disability Advocate 4115 Roosevelt Way NE, Ste B	
19	Seattle, WA 98101-2393 Telephone: (206) 626-6000	Seattle, WA 98105 Telephone: (206) 876-8515	
20	Fax: (206) 464-1496 E-mail: JGG@stokeslaw.com	Fax: (206) 876-8515 E-mail: conrad@wacda.com	
21	E-mail: JDH@stokeslaw.com	E-mail: jill@wacda.com	
22	Attorneys for Defendant Port of Seattle	Attorneys for Plaintiff Adrianna Killam	
23			
24			
	STIPULATION AND ORDER FOR STAY OF CASE UNTIL PENDING SETTLEMENT NEGOTIATIONS - 2 2:20-cv-00432-RSM	AUGUST 17, 2020 STOKES LAWRENCE, P.S. 1420 FIFTH AVENUE, SUITE 3000 SEATTLE, WASHINGTON 98101-2393 (206) 626-6000	

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1 2	ORDER Based on the foregoing Stipulation and Motion, IT IS SO ORDERED that Defendant's	
3	deadline to file a responsive pleading is extended to August 17, 2020.	
5 6	DATED this 28 th day of July, 2020.	
7 8	Dula	
° 9	RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE	
10 11		
12	Presented by:	
13	STOKES LAWRENCE, P.S.	
14 15	By: <u>/s/ Justo G. Gonzalez</u> Justo G. Gonzalez (WSBA #39127)	
16 17	By: <u>/s/ Joshua D. Harms</u> Joshua D. Harms (WSBA #55679)	
18	Attorneys for Defendant Port of Seattle	
19 20	WASHINGTON CIVIL AND DISABILITY ADVOCATE	
21	By: <u>/s/ Conrad Reynoldson</u> Conrad Reynoldson (WSBA #48187)	
22 23	By: <u>/s/ Jill Sulzberg</u> Jill Sulzberg (WSBA # 55946)	
24	Attorneys for Plaintiff Adrianna Killam	
	STIPULATION AND ORDER FOR STAY OF CASE UNTIL AUGUST 17, 2020 PENDING SETTLEMENT NEGOTIATIONS - 3 2:20-cv-00432-RSM SEATLE, WASHINGTON 98101-2393 (206) 626-6000	