

1 THE HONORABLE BARBARA J. ROTHSTEIN

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7 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 SA MUSIC, LLC, et al.,

No. 2:20-cv-0579-BJR

10 Plaintiffs,

**JOINT STIPULATION TO EXTEND  
DISCOVERY AND CASE-RELATED  
DEADLINES AND ORDER**

11 v.

12 AMAZON.COM, INC. et al.

13 Defendants.

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15 Plaintiffs SA Music, LLC; William Kolbert, as Trustee of the Harold Arlen Trust; Ray  
16 Henderson Music Company; Four Jays Music Company; and Julia Riva (collectively, "Plaintiffs")  
17 and Defendants Amazon.com, Inc. and Amazon.com Services LLC (collectively, "Defendants")<sup>1</sup>  
18 hereby stipulate and agree as follows:

19 WHEREAS, on April 16, 2020, Plaintiffs filed the Complaint in this case alleging  
20 copyright infringement against Defendants (Dkt No. 1);

21 WHEREAS, the Court entered a Pretrial Scheduling Order on July 9, 2020, which included  
22 a discovery cutoff date of June 9, 2021 (Dkt. No. 27);

23 WHEREAS, the parties have diligently conducted discovery and attempted in good faith  
24 to resolve discovery-related disputes;

25 WHEREAS, the parties have attempted in good faith to resolve the claims in this case;

26 <sup>1</sup> Additional defendants Pickwick International Limited, Pickwick Group Limited, Pickwick  
Australia PTY LTD, and Mastercorp PTY LTD have not yet appeared in this litigation.

1           WHEREAS, good cause exists for extending the fact and expert discovery deadlines to  
2 accommodate the logistical burdens of completing discovery obligations during the COVID-19  
3 pandemic and coordinating with parties headquartered outside of the United States;

4           WHEREAS, good cause exists for extending the pretrial and other case-related deadlines  
5 to accommodate the extension of discovery; and

6           WHEREAS, the parties have not previously sought any extensions of the deadlines in this  
7 case;

8           NOW, THEREFORE, the parties stipulate to and move the Court for entry of the following  
9 schedule pursuant to Local Rule 7(d)(1), which extends the discovery and other case-related  
10 deadlines by approximately 90 days:

- 11           1.       Reports of experts witnesses under FRCP 26(a)(2) due **August 9, 2021**.
- 12           2.       Discovery to be completed by **September 7, 2021**.
- 13           3.       All dispositive motions must be filed by **September 7, 2021**.
- 14           4.       All motions *in limine* must be filed by **January 31, 2022**.
- 15           5.       Joint Pretrial Statement shall be filed by **February 7, 2022**.
- 16           6.       Pretrial conference – **To be scheduled by the Court**.
- 17           7.       Jury Trial - **To be scheduled by the Court**.

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DATED: April 16, 2021

s/ Eric J. Weiss  
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1 DATED: April 16, 2021

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25 *Attorneys for Plaintiffs*  
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1 **ORDER**

2 Pursuant to the parties' stipulation, it is so ordered. In addition:

- 3 • Pretrial Conference is set for February 22, 2022 at 11:00 AM;  
4 • Jury Trial is set for March 7, 2022 at 9:30 AM.

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6 Dated this 26th day of April, 2021.

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10 Barbara Jacobs Rothstein  
11 U.S. District Court Judge

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13 Presented by:

14 s/ Eric J. Weiss

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