wport Villa	Condominium Owners Association v. Allstate Insurance	e Company et al	Do
1		JUDGE RICARDO S. MAI	RTINEZ
2			
3			
4			
5			
6			
7	UNITED STATES I WESTERN DISTRICT OF W		
8			
9	NEWPORT VILLA CONDOMINIUM OWNERS ASSOCIATION, a Washington Non-		
10	Profit Corporation, Plaintiff,	NO. 2:20-cv-01271-RSM	
11		STIPULATED MOTION AND ORDER	
12	V.	CONTINUE DEADLINE FOR FILING MOTIONS RELATED TO DISCOVER	
13	ALLSTATE INSURANCE COMPANY, an	DEADLINE FOR DISCOVERY TO B COMPLETED	E
14	Illinois Corporation; and DOE INSURANCE	COMPLETED	
15	COMPANIES 1-10,	NOTE ON MOTION CALENDAR: JUNE 28, 2021	
16	Defendants.	JUNE 20, 2021	
10	I. STIPULA	ATED MOTION	
18	Come now, Plaintiff Newport Villa Condominium Owners Association ("Association") and		
19	Defendant Allstate Insurance Company ("Allstate"), by and through their respective counsel, and		
20	stipulate to this motion for a continuance of the deadlines for filing motions related to discovery and		
21	for discovery to be completed.		
22	Counsel for the Association and Allstate ha	ave met and conferred and propose an exte	ension
23	of the following deadlines:		
24	Current	Deadline Proposed Deadline	

<i>–</i> '	ТL			T Toposed Deadmine
25	I	Deadline for Filing Motions	07/02/2021	07/16/2021
25		Related to Discovery		
26		Discovery Completed By	08/02/2021	08/16/2021
-01	17			

27

STIPULATED MOTION AND ORDER TO CONTINUE DEADLINE FOR FILING MOTIONS RELATED TO DISCOVERY AND DEADLINE FOR DISCOVERY TO BE COMPLETED - 1 STEIN, SUDWEEKS & STEIN, PLLC 2701 1ST AVE., SUITE 430 SEATTLE, WA 98121 PHONE 206.388.0660 FAX 206.286.2660

## II. GOOD CAUSE SHOWN

2 Pursuant to LCR 16(b)(6), a scheduling order may be modified "only for good cause and 3 with the judge's consent." Good cause exists here because the parties have agreed to enter into 4 mediation of this matter on July 14, 2021. For purposes of judicial economy, the parties propose 5 that the deadlines for filing motions related to discovery and for discovery to be completed be 6 rescheduled until after the mediation date. No previous extensions of time have been requested or 7 granted by the Court in this matter, and this extension is not made for purposes of delay, but rather 8 to permit the parties additional time in an attempt to resolve this matter amicably without incurring 9 substantial further costs or requiring additional time and resources on behalf of the Court. The 10 parties respectfully request that the Court extend the currently scheduled deadlines as set forth 11 above. A proposed order is included herewith. 12

## STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jessica R. Burns 14 Jerry H. Stein, WSBA 27721 Justin D. Sudweeks, WSBA 28755 15 Daniel J. Stein, WSBA 48739 Jessica Burns, WSBA 49852 16 2701 First Avenue, Suite 430 Seattle, WA 98121 17 Email: jerry@condodefects.com Email: justin@condodefects.com 18 Email: dstein@condodefects.com Email: jessica@condodefects.com 19 Telephone: (206) 388-0660 20 Facsimile: (206) 286-2660 Attorneys for Plaintiff 21 WILSON SMITH COCHRAN DICKERSON 22 23 /s/ Richard G. Gawlowski Alfred E. Donohue, WSBA 32774 24 Richard G. Gawlowski, WSBA 19713 901 Fifth Avenue, Suite 1700 25 Seattle, WA 98164-2050 Phone: (206) 623-4100 26

27

1

13

STIPULATED MOTION AND ORDER TO CONTINUE DEADLINE FOR FILING MOTIONS RELATED TO DISCOVERY AND DEADLINE FOR DISCOVERY TO BE COMPLETED - 2 STEIN, SUDWEEKS & STEIN, PLLC 2701 1ST AVE., SUITE 430 SEATTLE, WA 98121 PHONE 206.388.0660 FAX 206.286.2660

1	Email: Donohue@wscd.com	
2	Email: gawlowski(@wscd.com	
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15	5	
16	5	
17	7	
18	3	
19		
20		
21		
22	2	
23	3	
24	4	
25	5	
26	5	
27		
	STIPULATED MOTION AND ORDER TO CONTINUE DEADLINE FOR FILING MOTIONS RELATED TO DISCOVERY AND DEADLINE FOR DISCOVERY TO BE COMPLETED - 3STEIN, SUDWEEKS & STEIN, I 2701 1ST AVE., SUITE 430 SEATTLE, WA 98121 PHONE 206.388.0660 FAX 206.2	)

1	ORDER			
2	Pasad on the above Stimulated Motion, IT IS SO OPDEPED that the deadlines for filing			
3	Based on the above Stipulated Motion, IT IS SO ORDERED that the deadlines for filing			
4	motions related to discovery and for discovery to be completed are extended as follows:			
5		Current Dead		Proposed Deadline
6	Deadline for Filing Motions Related to Discovery	07/02/202	21	07/16/2021
	Discovery Completed By	08/02/202	21	08/16/2021
7 8	No other deadlines or ever	nts are altered.		
9	<b>DATED</b> this 30 <sup>th</sup> day of June, 2021.			
10				
11		$\bigcirc$		
12	RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE			
13				
14		Chief C		S DISTRICT JODGE
15				
16				
17	Presented By:			
18	STEIN, SUDWEEKS & STEIN	, PLLC		
19	/s/ Jessica R. Burns			
20	Jerry H. Stein, WSBA 27721 Justin D. Sudweeks, WSBA 28753	5		
21	Daniel J. Stein, WSBA 48739 Jessica Burns, WSBA 49852			
22	2701 First Avenue, Suite 430 Seattle, WA 98121			
23	Email: jerry@condodefects.com			
24	Email: justin@condodefects.com Email: dstein@condodefects.com			
25	Email: jessica@condodefects.com Telephone: (206) 388-0660	1		
26	Facsimile: (206) 286-2660			
27	Attorneys for Plaintiff			
21	STIPULATED MOTION AND ORD CONTINUE DEADLINE FOR FILIN RELATED TO DISCOVERY AND D DISCOVERY TO BE COMPLETED	IG MOTIONS EADLINE FOR	2701 1ST SEAT	VEEKS & STEIN, PLLC AVE., SUITE 430 TLE, WA 98121 8.0660 FAX 206.286.2660

1	WILSON SMITH COCHRAN DICKERSON		
2	/s/ Richard G. Gawlowski		
3	Alfred E. Donohue, WSBA 32774		
4	Richard G. Gawlowski, WSBA 19713 901 Fifth Avenue, Suite 1700		
5	Seattle, WA 98164-2050 Phone: (206) 623-4100		
6	Email: Donohue@wscd.com Email: gawlowski@wscd.com		
7	Attorneys for Defendant		
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27	STIPULATED MOTION AND ORDER TOSTEIN, SUDWEEKS & STEIN, PLLCCONTINUE DEADLINE FOR FILING MOTIONS2701 1ST AVE., SUITE 430RELATED TO DISCOVERY AND DEADLINE FORSEATTLE, WA 98121DISCOVERY TO BE COMPLETED - 5PHONE 206.388.0660FAX 206.286.2660		

1	CERTIFICATE OF SERVICE		
2	I hereby certify that on June 28, 2021 a copy of the foregoing <i>Document</i> and this		
3	Certificate of Service were served on counsel below as noted:		
4	Attorneys for Allstate Insurance Company: 🛛 via US Mail		
5	Alfred E. Donohue 🗆 via Legal Messenger		
6	Wilson Smith Cochran Dickerson		
7	901 Fifth Avenue, Suite 1700 Seattle, WA 98164-2050		
8	Phone: (206) 623-4100 Email:		
9	Donohue@wscd.com; gawlowski@wscd.com;		
10	obrien@wscd.com;		
11	strelyuk@wscd.com; ossenkop@wscd.com;		
12	mcneill@wscd.com		
13	I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.		
14	SIGNED this 28th day of June, 2021 at Seattle, Washington.		
15	/s/ Banjugu Nyangado		
16	Banjugu Nyangado		
17	Stein, Sudweeks & Stein, PLLC 2701 First Avenue, Suite 430		
18 19	Seattle, WA 98121 Phone: (206) 388-0660		
20	Email:temp@condodefects.com		
20			
21			
23			
24			
25			
26			
27			
	STIPULATED MOTION AND ORDER TO CONTINUE DEADLINE FOR FILING MOTIONS RELATED TO DISCOVERY AND DEADLINE FOR DISCOVERY TO BE COMPLETED - 6STEIN, SUDWEEKS & STEIN, PLLC 2701 1ST AVE., SUITE 430 SEATTLE, WA 98121 PHONE 206.388.0660 FAX 206.286.2660		