

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SETH VILLAFAN, a single man; WOLFGANG OLSON, a single man; and JOSH GRAVES, a married but separated man,

Plaintiffs,

v.

NORTHWEST MOTORSPORT, LLC, a Washington limited liability company; HILT VENTURE CAP INC., a Washington limited liability company; DONALD FLEMING and JANE DOE FLEMING, residents of Montana, and the marital community composed thereof; NORTHWEST MOTORSPORT, INC., a Washington corporation; RICHARD FORD and JANE DOE FORD, residents of Texas, and the marital community composed thereof; RFJ AUTO PARTNERS NORTHERN HOLDINGS, INC., a Delaware corporation; JOHN and JANE DOES 1-5 and the marital communities composed thereof; and RFJ AUTO GROUP, INC., a foreign corporation,

Defendants.

NO. 2:20-cv-01616 TSZ

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF DEADLINE
FOR FILING MOTIONS RELATED
TO CLASS CERTIFICATION**

CLERK'S ACTION REQUIRED

**NOTE ON MOTION CALENDAR:
WEDNESDAY, NOVEMBER 15, 2022**

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 1**
No. 2:20-cv-01616 TSZ

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I. STIPULATED REQUESTED RELIEF

Pursuant to LCR 7(j) and LCR 10(g), the parties to this action, hereby stipulate and jointly request relief regarding the deadline for filing motions related to class certification.

Event	Current Deadline	Proposed Deadline
Deadline for filing motions related to class certification	November 17, 2022	December 1, 2022

The parties agree that the current deadline for filing a motion for class certification should be extended to December 1, 2022. Good cause exists for this extension of time given the scheduling conflicts of experts whose participation in the preparation of the motion is essential. One such expert also continues to recover from Covid. The parties agree that the current deadline for filing motions related to class certification should be extended to Thursday, December 1, 2022.

Based on the foregoing, counsel for the parties has conferred and agreed that an extension of the deadline for filing motions related to class certification is warranted. The parties hereby stipulate to the proposed extension.

IT IS SO STIPULATED, and a proposed order consistent with LCR 10(g) is attached herewith. The parties respectfully request entry of the subjoined order.

IT IS SO STIPULATED. THROUGH COUNSEL OF RECORD.

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 2**

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1 DATED this 15th day of November, 2022.

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11 DATED this 15th day of November, 2022.

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23
24
25 **STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 3**
No. 2:20-cv-01616 TSZ

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ORDER

This matter, having come before the Court on the above-stipulated motion, IT IS

SO ORDERED THAT:

1. Relief is granted to extend the following deadline:

Event	Current Deadline	New Deadline
Deadline for filing motions related to class certification	November 17, 2022	December 1, 2022

Dated this 17th day of November, 2022.

Thomas S. Zilly

THE HONORABLE THOMAS S. ZILLY

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 4**
No. 2:20-cv-01616 TSZ

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