

THE HONORABLE BARBARA J. ROTHSTEIN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PARLER LLC,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:21-cv-00031-BJR

JOINT STIPULATION AND  
ORDER FOR AMENDMENT AND  
RESPONSE SCHEDULE

**NOTE ON MOTION CALENDAR:  
February 16, 2021**

**JOINT STIPULATION**

Pursuant to the Court’s Standing Order (Dkt. 35), and the Joint Stipulation and the Court’s Order dated January 28, 2021 (Dkt. 38), the Parties submit the following stipulation:

1. The deadline for Plaintiff Parler LLC (“Parler”) to file its Amended Complaint is February 16, 2021.
2. The deadline for Defendant Amazon Web Services, Inc. (“AWS”) to respond to Plaintiff Parler’s Amended Complaint is March 22, 2021.

JOINT STIPULATION  
AND ORDER  
(CASE NO. 2:21-cv-31-BJR) – 1



David J. Groesbeck, P.S.  
Attorney and Counselor  
1333 E. Johns Prairie Rd.  
Shelton, Washington 98584  
(509) 747-2800

1 3. Counsel for Parler represents that on or about Saturday, February 13, 2021, Parler  
2 engaged the legal services of Mr. Angelo J. Calfo of the Calfo Eakes LLP law  
3 firm. In sum, Parler believes that it and Mr. Calfo need an extension of time for  
4 Mr. Calfo to review the pleadings and to be prepared to assist Parler and its current  
5 counsel with the filing of the Amended Complaint.  
6

7 4. Moreover, counsel for Parler represents that Parler has been working to pursue its  
8 working model to get back online; that Parler was able to get back online beginning  
9 on February 15, 2021; and Parler believes that this factual development, which  
10 occurred just one day before the current deadline to file the Amended Complaint,  
11 will have a material impact on how Parler pleads the Amended Complaint.  
12

13 5. Counsel for Parler is familiar with the Court's Standing Order (Dkt. 35), which  
14 requires extensions of time be requested three days in advance. However, Parler's  
15 counsel believes that good cause exists to adjust the scheduling of the  
16 aforementioned pleadings and that the administration of justice will be served  
17 thereby.  
18

19 6. AWS does not oppose Parler's request for additional time.

20 7. On January 25, 2021, the Court entered an Order setting Initial Scheduling Dates.

21 8. The parties agree that upcoming deadlines should be revised, as set forth below.  
22

23 a. Parler will file an Amended Complaint no later than March 2, 2021;

24 b. AWS's deadline to respond to Parler's Amended Complaint will be April  
25 8, 2021;

26  
27 c. Deadline for FRCP 26(f) conference: May 21, 2021

28 d. Initial Disclosures: May 28, 2021  
29  
30



1 e. Joint Status Report and Discovery Plan: June 4, 2021

2 9. The parties respectfully request that the Court memorialize these revised deadlines  
3 by entering the proposed order accompanying this stipulation.  
4

5  
6 Dated this 15<sup>th</sup> day of February, 2021.

7 Respectfully submitted,

8 DAVID J. GROESBECK, P.S.

9  
10 /s David J. Groesbeck  
11 WSBA No. 24749  
12 1333 E. Johns Prairie Rd.  
13 Shelton, WA 98584  
14 Telephone: (509) 747-2800  
15 Email: [david@groesbecklaw.com](mailto:david@groesbecklaw.com)

16 *Counsel for Parler, LLC*

17 DAVIS WRIGHT TREMAINE LLP

18  
19 By s/Ambika K. Doran  
20 Ambika Kumar Doran, WSBA #38237  
21 920 Fifth Avenue, Suite 3300  
22 Seattle, WA 98104-1610  
23 Telephone: 206-622-3150  
24 E-mail: [ambikadoran@dwt.com](mailto:ambikadoran@dwt.com)

25 Alonzo Wickers IV, (*pro hac vice*)  
26 865 S. Figueroa Street, Suite 2400  
27 Los Angeles, CA 90017  
28 Telephone: 213-633-6800  
29 E-mail: [alonzowickers@dwt.com](mailto:alonzowickers@dwt.com)

30 *Counsel for Amazon Web Services, Inc.*

31 JOINT STIPULATION  
32 AND ORDER  
(CASE NO. 2:21-cv-31-BJR) – 3



David J. Groesbeck, P.S.  
Attorney and Counselor  
1333 E. Johns Prairie Rd.  
Shelton, Washington 98584  
(509) 747-2800

**ORDER**

Pursuant to the stipulation, IT IS SO ORDERED.

DATED this 17th day of February, 2021.



Barbara Jacobs Rothstein  
U.S. District Court Judge

