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The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

D.S. by and through her next friend
TARA URS; *et al.*,

Plaintiffs,

v.

WASHINGTON STATE
DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILIES; *et al.*,

Defendants.

NO. 2:21-cv-00113-BJR

STIPULATION AND ORDER
REGARDING DISCOVERY
RESPONSES AND AMENDMENT
TO SCHEDULING ORDER

I. STIPULATION

The parties, by and through their respective attorneys of record, report to the Court that they are actively engaged in mediation efforts facilitated by mediator Kathleen Noonan. In furtherance of these efforts and to allow the parties to focus on the possible resolution of this matter, the parties hereby stipulate to the following:

1 1. The parties agree to a stay of discovery until August 27, 2021, meaning that
2 neither party has the duty to answer or respond to discovery requests served on them, with
3 following exceptions:

- 4 a. Defendants' production of Named Plaintiff H.A.'s case file as soon as possible,
5 including the potential disclosure of email correspondence after exchange of
6 search terms by the parties and discussions regarding volume to be produced;
7 b. Plaintiffs' taking of two depositions related to the H.A. case file;
8 c. Defendants' production of the RDA Phase 1 data report and other data related to
9 youth who are staying in hotels, motels, or offices or for one-night stays, as agreed
10 by the parties; and
11 d. Defendants' continuation of their efforts to assemble case file information on the
12 other named Plaintiffs by the end of the stay of discovery.

13 2. The parties agree that the current pretrial schedule in this matter (Dkt. No. 22, as
14 amended by Dkt. No. 61) should be amended such that Plaintiffs' motion for class certification
15 will be filed on or by November 2, 2021.

16 3. The parties agree that this Court should enter an order that approves and adopts
17 this stipulation.

18 RESPECTFULLY SUBMITTED this 23rd day of July 2021.

19 PLAINTIFFS' COUNSEL

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Attorney General

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s/Daniel J. Judge
25 DANIEL J. JUDGE, WSBA No. 17392
Senior Counsel
WILLIAM MCGINTY,
WSBA No. 41868
JAMES M. RICHARDSON III,
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Assistant Attorneys General

26 *Attorneys for Plaintiffs*

Attorneys for Defendants

II. ORDER

IT IS HEREBY ORDERED that:

1. The stipulation of the parties is APPROVED AND ADOPTED. Dkt. No. 22, as amended by Dkt. No. 61, is further AMENDED: Plaintiffs' Motion for Class Certification is to be filed on or by November 2, 2021.

2. Discovery in this matter is stayed until August 27, 2021, meaning that neither party has the duty to answer or respond to discovery requests served on them, with following exceptions:

- a. Defendants' production of Named Plaintiff H.A.'s case file as soon as possible, including the potential disclosure of email correspondence after exchange of search terms by the parties and discussions regarding volume to be produced;
- b. Plaintiffs' taking of two depositions related to the H.A. case file;
- c. Defendants' production of the RDA Phase 1 data report and other data related to youth who are staying in hotels, motels, or offices or for one-night stays, as agreed by the parties; and
- d. Defendants' continuation of their efforts to assemble case file information on the other named Plaintiffs by the end of the stay of discovery.

Dated this 4th day of August, 2021.



BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE

1 Presented by:

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3 s/Susan Kas

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1 Approved for Entry by:

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3 Attorney General

4 *s/Daniel J. Judge*

5 DANIEL J. JUDGE, WSBA No. 17392

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2021, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Daniel Judge	danielj@atg.wa.gov
William McGinty	WilliamM1@atg.wa.gov
James Richardson	james.richardsoniii@atg.wa.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 23rd day of July, 2021.

/s/Mona Rennie
Mona Rennie, Legal Assistant
Disability Rights Washington