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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ALBERTO RIVERA MONROY and IRMA  
PARRA-RIVERA, husband and wife,

Plaintiffs,

v.

REAL TIME RESOLUTIONS INC.,  
MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC., and  
MTC FINANCIAL INC. d/b/a TRUSTEE  
CORPS.

Defendants.

2:21-cv-00813-BJR

STIPULATED MOTION AND ORDER  
TO EXTEND TRIAL AND REMAINING  
CASE DEADLINES

REAL TIME RESOLUTIONS INC.,

Counterclaim-Plaintiff,

v.

ALBERTO RIVERA MONROY and IRMA  
PARRA-RIVERA, husband and wife,

Counterclaim-Defendants.

**I. STIPULATED MOTION**

The Plaintiffs, Alberto Rivera Monroy and Irma Parra-Rivera, husband and wife and the marital community composed thereof, collectively (“Plaintiffs / Counterclaim Defendants”), and Real Time Resolutions, Inc. (“RTR”), Mortgage Electronic Registration Systems, Inc.

1 (“MERS”), and MTC Financial Inc., d/b/a Trustee Corps (“MTC”), by and through their  
2 undersigned counsel, stipulate as follows:

3 Plaintiffs intend to take the oral, remote deposition of RTR's 30(b)(6) deponent and  
4 MERS' 30(b)(6) deponent, and RTR intends to take the oral, remote deposition of Plaintiffs.  
5 The parties have met and agreed to extend the trial and case schedule deadlines as set forth  
6 herein pursuant to Local Rules (d)(1), 10(g) and 16(b) and hereby file this stipulated motion to  
7 request that the court continue the deadlines as set forth herein in the case schedule and for a  
8 continuation of the Trial as currently set by the Court's Order Setting Jury Trial and Pretrial  
9 Dates (Dkt No. 46).

10 This is the second request for an extension of the case schedule requested by the parties.  
11 At this stage in the litigation, the parties are working together in good faith to complete  
12 discovery and other matters in the case and believe that there is good cause for an extension of  
13 deadlines as requested herein.

14 Specifically, the parties are in the process of narrowing certain outstanding discovery  
15 disputes relating to discovery requests which have already been propounded and responded to,  
16 which they expect to be completed by August 10, 2022, and after that date, the parties intend to  
17 bring any remaining outstanding issues before the court for resolution via a telephone  
18 conference and/or discovery motions for resolution. Once these disputes are resolved, the  
19 parties will set dates to depose the Rule 30(b)(6) witnesses for RTR, MERS, and Plaintiffs on  
20 deposition notices that have already been served. Thus, the continuance of the trial and the  
21 below deadlines will allow resolution of the remaining discovery issues in this case and thus  
22 the Parties request a 90 (day) extension as detailed herein, with the trial extended out  
23 accordingly. For the avoidance of doubt, the Parties do not intend and do not agree that the  
24 requested extension will permit any new written discovery requests or notices of deposition.  
25 Rather, the Parties intend and agree to allow sufficient time to resolve disputes on those existing  
26 discovery requests that have already been propounded, and completion of those depositions that  
have already been noticed. The Parties agree they do not waive any rights via this stipulation.

|    |                             |              |                          |
|----|-----------------------------|--------------|--------------------------|
| 1  | Trial Date                  | Current Date | New Date                 |
| 2  |                             | 2/13/2023    | 5/13/2023 or a date      |
| 3  |                             |              | convenient for the Court |
| 4  | Completion of Outstanding   | 7/31/2022    | 10/31/2022               |
| 5  | Depositions and discovery   |              |                          |
| 6  | motions regarding Pending   |              |                          |
| 7  | Discovery <sup>1</sup>      |              |                          |
| 8  | All dispositive Motion must | 9/14/2022    | 12/14/2022               |
| 9  | be Completed by             |              |                          |
| 10 | All motions in limine must  | 1/7/2023     | 4/7/2023                 |
| 11 | be filed by                 |              |                          |
| 12 | Joint Pretrial Statement    | 1/14/2023    | 4/14/2023                |
| 13 |                             |              |                          |
| 14 | Pretrial Conference         | 1/30/2023    | 4/30/2023                |
| 15 |                             |              |                          |
| 16 | Length of Trial             | 4 days       | Jury                     |

17  
18 STIPULATED this 28<sup>th</sup> day of July, 2022  
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24  
25 <sup>1</sup> The Parties agree that no new written discovery or deposition notices are included in this  
26 request, and none will be allowed under this stipulation. “Outstanding Discovery” and “Pending  
Discovery,” as used in this stipulation and order refer only to the depositions of plaintiffs, to the  
30(b)(6) depositions of RTR and MERS, and to the written discovery requests and responses  
that have already been propounded in this case.

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**II. ORDER**

The Court having considered the foregoing stipulated motion of the Parties in this case, and finding that good cause has been shown for the requested relief, now therefore, it is hereby

ORDERED as follows:

| <b>Trial Date</b>   | <b>Current Date</b> | <b>New Date</b>                              |
|---|---------------------|--|
|   | 2/13/2023           | 5/15/2023 or a date convenient for the Court |
| Completion of Outstanding Depositions and discovery motions regarding Pending Discovery | 7/31/2022           | 10/31/2022                                   |
| All dispositive Motion must be Completed by   | 9/14/2022/          | 12/14/2022                                   |
| All motions in limine must be filed by  | 1/7/2023            | 4/7/2023                                     |
| Joint Pretrial Statement  | 1/14/2023           | 4/14/2023                                    |
| Pretrial Conference   | 1/30/2023           | 5/3/2023                                     |
| Length of Trial   | 4 days              | Jury   |

DONE THIS 2nd day of August, 2022.



The Hon. Barbara J. Rothstein  
United States District Court Judge