

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9	QUINTE HARRIS, an individual,)	
10)	Case No. 2:22-cv-00555-RSM
	Plaintiff,)	
11	v.)	STIPULATION AND ORDER
)	REGARDING DEADLINE TO
)	RESPOND TO COMPLAINT
12	SKANSKA, BALFOUR BEATTY JV,)	
13	MICROSOFT CORPORATION, and)	
	BALFOUR BEATTY CONSTRUCTION,)	
14	corporations)	
	Defendants.)	
15)	

IT IS HEREBY STIPULATED and AGREED by and between Plaintiff Quinte Harris (“Harris”) and Defendants Skanska USA Building Inc. and Balfour Beatty Construction, LLC (the “Construction Defendants”) and Defendant Microsoft Corporation (“Microsoft”) pursuant to Federal Rule of Civil Procedure 6(b) and LCR 7(d)(1) that:

1. Defendants’ time to respond to the Complaint filed on or about April 25, 2022, and served on Defendants on or about June 30, 2022 ("Complaint") was extended by prior stipulation from July 21, 2022 to August 16, 2022.
2. Defendants’ time to respond to the Complaint is now extended to September 6, 2022.
3. Good cause exists for the agreed extension because Plaintiff requested additional time to consider possible amendments to the Complaint, and extending the deadline for

STIPULATION TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT - 1
Case No. 2:22-CV-00555

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1 Defendants to respond to the Complaint will serve the cause of efficiency by providing
2 Plaintiff with the opportunity to consider whether to amend his Complaint, and avoiding
3 the need for Defendants to respond to a Complaint that may be mooted by Plaintiff's
4 filing of an amended complaint.

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- 6 4. The Court issued a Revised Order Regarding Initial Disclosures, Joint Status Report,
7 and Early Settlement on July 21, 2022 [Dkt. 16] ("Revised Scheduling Order"), but
8 parties respectfully request that the Court issue an additional revised Initial Scheduling
9 Order further extending the deadlines in line with the new deadline to respond to the
10 Complaint, as follows:

11	Deadline for FRCP 26(f) Conference:	9/22/22
12	Initial Disclosures Pursuant to FRCP 26(a)(1)	9/29/22
13	Combined Joint Status Report and Discovery Plan	10/6/22
14	As required by FRCP 26(f) and Local Civil Rule 26(f)	

- 15 5. Aside from the Revised Scheduling Order addressed in paragraph 4, no other dates have
16 yet been set in the case.

17

18 DATE: August 8, 2022.

19 BRADLEY BERNSTEIN SANDS LLP

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21 By s/ Heidi B. Bradley

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Attorneys for Plaintiff Quinte Harris

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Defendants should answer or otherwise respond to Plaintiff's Complaint on or before September 6, 2022.

The Court will enter a revised Initial Scheduling Order.

DATED this 10th day of August, 2022.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I am a resident of the State of Washington, over the age of eighteen years, and not a party to above-entitled action. My business address is 113 Cherry St. PMB 62056, Seattle, WA 98104-2205.

I hereby certify, under penalty of perjury under the laws of the State of Washington, that on the 8th day of August, 2022, I filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will give notice of such filing to the following:

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Executed on the 8th day of August, 2022, at Seattle, Washington.

/s/ Heidi B. Bradley
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