

HONORABLE JAMAL N. WHITEHEAD

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

<p>STONEBRIDGE HOMEOWNERS ASSOCIATION, a Washington Non-Profit Corporation,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>OREGON MUTUAL INSURANCE COMPANY, an Oregon Corporation; and DOE INSURANCE COMPANIES 1-10,</p> <p style="text-align: center;">Defendants.</p>

NO. 2:22-CV-01101-JNW

STIPULATED MOTION AND ORDER TO
CONTINUE DEADLINE FOR FILING
MOTIONS RELATED TO DISCOVERY
AND DEADLINE FOR DISCOVERY TO BE
COMPLETED

NOTE ON MOTION CALENDAR:
MARCH 21, 2024

I. STIPULATED MOTION

Come now, Plaintiff Stonebridge Homeowners Association (“Association”) and Defendant Oregon Mutual Insurance Company (“Oregon Mutual”), by and through their respective counsel, and stipulate to this motion for a continuance of the deadlines for filing motions related to discovery and for discovery to be completed.

Counsel for the Association and Oregon Mutual have met and conferred and propose an extension of the following deadlines:

	Current Deadline	Proposed Deadline
Deadline for Filing Motions Related to Discovery	04/10/2024	04/24/2024
Discovery Completed By	05/10/2024	05/24/2024

STIPULATED MOTION AND ORDER TO CONTINUE
DEADLINE FOR FILING MOTIONS RELATED TO
DISCOVERY AND DEADLINE FOR DISCOVERY TO
BE COMPLETED - 1

STEIN, SUDWEEKS & STEIN, PLLC
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TUKWILA, WA 98188
PHONE 206.388.0660 FAX 206.286.2660

1 **II. GOOD CAUSE SHOWN**

2 Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause and
3 with the judge’s consent.” Good cause exists here because the parties have agreed to enter into
4 mediation of this matter on April 5, 2024. For purposes of judicial economy, the parties propose
5 that the deadlines for filing motions related to discovery and for discovery each be extended two
6 weeks to allow the parties to prepare discovery motions and take depositions after the mediation, if
7 necessary. This extension is not made for purposes of delay, but rather to permit the parties
8 additional time in an attempt to resolve this matter amicably without incurring substantial further
9 costs or requiring additional time and resources on behalf of the Court. The parties respectfully
10 request that the Court extend the currently scheduled deadlines as set forth above. A proposed
11 order is included herewith.

12 DATED this 21st day of March, 2024.

13 **STEIN, SUDWEEKS & STEIN, PLLC**

14 /s/ Jerry H. Stein

15 /s/ Justin D. Sudweeks

16 /s/ Daniel J. Stein

17 /s/ Jessica R. Burns

18 Jerry H. Stein, WSBA #27721

19 Justin D. Sudweeks, WSBA #28755

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Attorneys for Plaintiff

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DATED this 21st day of March, 2024.

SOHA & LANG, P.S.

/s/ Jennifer P. Dinning

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ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the deadlines for filing motions related to discovery and for discovery to be completed are extended as follows:

	Current Deadline	Proposed Deadline
Deadline for Filing Motions Related to Discovery	04/10/2024	04/24/2024
Discovery Completed By	05/10/2024	05/24/2024

No other deadlines or events are altered.

DATED THIS 10th day of April, 2024.



Jamal N. Whitehead
United States District Judge

Presented by:

STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jerry H. Stein

/s/ Justin D. Sudweeks

/s/ Daniel J. Stein

/s/ Jessica R. Burns

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 21, 2024, a copy of the foregoing *Document* and this

3 *Certificate of Service* were served on counsel below as noted:

4 Attorneys for Defendant Oregon Mutual

5 Insurance Company:

Jillian M. Henderson

via US Mail

Jennifer P. Dinning

via Legal Messenger

6 Soha & Lang, P.S.

via E-Mail

7 1325 Fourth Avenue, Suite 940

via USDC ECF

Seattle, WA 98101-2509

8 henderson@sohalang.com

dinning@sohalang.com

9 I declare under penalty of perjury under the laws of the State of Washington that the
10 foregoing is true and correct.

11 DATED this 21st day of March, 2024, at Tukwila, Washington.

12 *s/Zach Heafner*

Zach Heafner

13 Stein, Sudweeks & Stein, PLLC

14 16400 Southcenter Parkway, Suite 410

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