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The Honorable Marsha J. Pechman

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

MAJID ALFARAG,

Plaintiff,

v.

LOUIS DEJOY, Postmaster General, U.S.  
Postal Service,

Defendant.

Case No. 2:22-cv-01745-MJP

STIPULATED MOTION AND  
~~PROPOSED~~ ORDER FOR EXTENSION  
OF TIME TO RESPOND TO MOTION FOR  
JUDGMENT ON THE PLEADINGS AND  
CORRESPONDING MODIFICATION OF  
CASE SCHEDULE

Noted for Consideration:  
May 8, 2024

As a result of Plaintiff’s request for more time to search for legal representation, the parties hereby STIPULATE, AGREE and JOINTLY REQUEST an order extending the response and corresponding reply deadlines for Defendant’s Motion for Judgment on the Pleadings by 60 days modifying the deadlines set forth in the Court’s July 21, 2023, Order Setting Trial and Related Dates (Dkt. 22), as follows:

| <u>Deadline</u>  | <u>Current Deadline</u> | <u>Proposed New Deadline</u> |
|--|-------------------------|------------------------------|
| Plaintiff's Response to Defendant's Motion for Judgment on the Pleading due by | 5/13/2024               | 7/15/2024                    |
| Defendant's Reply in Support of Motion for Judgment on the Pleadings due by    | 5/17/2024               | 7/19/2024                    |
| Discovery completed by   | 5/20/2024               | 7/19/2024                    |
| All dispositive motions must be filed by                                       | 6/17/2024               | 8/16/2024                    |

In addition, the parties ask the Court to set a new trial date of no earlier than December 16, 2024, with all trial related deadlines set corresponding to the new trial date. The parties have set forth their current scheduling conflicts below:

Plaintiff:

Defendant: December 26, 2024–January 3, 2025; January 14–20, 2025; February 24–March 11, 2025; April 14–18, 2025; May 12–15, 2025.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). Good cause exists for extending the specific deadlines noted above, as Plaintiff is requesting additional time to respond to Defendant's Motion in order to seek counsel. Defendant joins in the request in order to provide Plaintiff sufficient time.

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1           **SO STIPULATED.**

2           DATED this 8th day of May, 2024.

3   Respectfully submitted,

4   TESSA M. GORMAN  
5   United States Attorney

6   s/ Rebecca S. Cohen  
7   REBECCA S. COHEN, WSBA No. 31767

8   s/ Alexandria K. Morris  
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19   *Attorneys for Defendant DeJoy*

20   I certify that this memorandum contains 258  
21   words, in compliance with the Local Civil Rules.

22   s/ Majid Alfarag  
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28   *Pro Se Plaintiff*

1 **ORDER**

2 It is hereby ORDERED that the parties' motion is GRANTED.

3  
4 DATED this 8th day of May, 2024.

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8 MARSHA J. PECHMAN  
United States Senior District Judge