

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

CINDY CODONI, MICHELLE GEER,
HORACE CATHCART, AMY FRANCE, and
TAMARA CHAKOS, individually and on behalf
of all others similarly situated,

Plaintiffs.

V.

PORT OF SEATTLE, ALASKA AIR GROUP,
and DELTA AIR LINES, INC.,

Defendants

Case No. 2:23-CV-00795 JNW

**STIPULATED MOTION REGARDING
BRIEFING DEADLINES FOR
PLAINTIFFS' OPPOSITION TO AND
DEFENDANTS' REPLIES IN SUPPORT
OF DEFENDANTS' MOTIONS TO
DISMISS PLAINTIFFS' SECOND
AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:
November 13, 2023**

STIP. MOT. RE: BRIEFING DEADLINES FOR DEF.'S MOT. TO DISMISS
2D AM. COMPL.

HAGENS BERMAN
1301 Second Avenue, Suite 2000, Seattle, WA 98101
(206) 623-7292 OFFICE (206) 623-0594 FAX

1 Pursuant to Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiffs Cindy
2 Codoni, Michelle Geer, Horace Cathcart, Amy France, and Tamara Chakos (“Plaintiffs”) and
3 Defendants Alaska Air Group, Delta Airlines, Inc. (“Airlines”), and Port of Seattle (collectively,
4 “Defendants”) stipulate and move as follows:

5 WHEREAS, on June 27, 2023, this Court ordered Plaintiffs to file a Second Amended
6 Complaint on or before August 11, 2023, and ordered the parties to confer in good faith to set a
7 deadline for Defendants to respond to the Second Amended Complaint (ECF No. 41);

8 WHEREAS, on August 11, 2023, Plaintiffs filed their Second Amended Class Action
9 Complaint (ECF No. 43);

10 WHEREAS, on September 18, 2023, this Court ordered Defendants to file their Rule 12
11 motions in response to the Second Amended Complaint on or before October 27, 2023, and
12 ordered the parties to confer in good faith to set a deadline for Plaintiffs’ opposition to Defendants’
13 motions and Defendants’ replies in support thereof (ECF No. 45); and

14 WHEREAS, the parties have conferred in good faith regarding an appropriate briefing
15 schedule and agree that Plaintiffs’ deadline to file their opposition to Defendants’ motions to
16 dismiss is December 22, 2023, and Defendants’ deadline to file their replies in support of their
17 motions is February 16, 2024;

18 **THEREFORE, IT IS STIPULATED AND AGREED** among the Parties, subject to the
19 Court’s approval, that:

20 1. Plaintiffs shall file their opposition(s) to Defendants’ motions to dismiss Plaintiffs’
21 Second Amended Complaint on or before December 22, 2023.

22 2. Defendants shall file their replies in support of their motions to dismiss Plaintiffs’
23 Second Amended Complaint on or before February 16, 2024.

24 3. Nothing in this stipulated order shall alter any other deadlines in the case, including
25 those deadlines included in this Court’s September 18, 2023, order (ECF No. 45).

26 **IT IS SO STIPULATED.**

1 DATED: November 13, 2023

HAGENS BERMAN SOBOL SHAPIRO LLP

2
3 By: s/Steve W. Berman
4 Steve W. Berman, WSBA No. 12536

5 *Attorney for Plaintiffs*

6 DATED: November 13, 2023

7 MCNAUL EBEL NAWROT & HELGREN
8 PLLC

9 By: s/ Malaika M. Eaton
10 Malaika M. Eaton, WSBA No. 32837

11 *Attorney for Defendant Delta Air Lines, Inc.*

12 DATED: November 13, 2023

13 CORR CRONIN LLP

14 By: s/ Steven W. Fogg
15 Steven W. Fogg, WSBA No. 23528

16 *Attorney for Defendant Alaska Air Group*

17 DATED: November 13, 2023

18 STOEL RIVES LLP

19 By: s/ Beth Ginsberg
20 Beth Ginsberg, WSBA No. 18523

21 *Attorney for Defendant Port of Seattle*

IT IS SO ORDERED:

22 Dated this 14th day of November, 2023.

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1 Presented by:

2 DATED: November 13, 2023

HAGENS BERMAN SOBOL SHAPIRO LLP

4 By: s/Steve W. Berman
5 Steve W. Berman, WSBA No. 12536

6 *Attorney for Plaintiffs*

7 DATED: November 13, 2023

8 MCNAUL EBEL NAWROT & HELGREN
9 PLLC

10 By: s/Malaika M. Eaton
11 Malaika M. Eaton, WSBA No. 32837

12 *Attorney for Defendant Delta Air Lines, Inc.*

13 DATED: November 13, 2023

14 CORR CRONIN LLP

15 By: s/Steven W. Fogg
16 Steven W. Fogg, WSBA No. 23528

17 *Attorney for Defendant Alaska Air Group*

18 DATED: November 13, 2023

19 STOEL RIVES LLP

20 By: s/Beth Ginsberg
21 Beth Ginsberg, WSBA No. 18523

22 *Attorney for Defendant Port of Seattle*