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HONORABLE BARBARA J. ROTHSTEIN  
HONORABLE S. KATE VAUGHAN

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

MATT WRIGHT,  
  
Plaintiff,  
  
v.  
  
STATE OF WASHINGTON, WASHINGTON  
STATE DEPARTMENT OF CORRECTIONS,  
CHRISTINE GOMES, TRACI DRAKE, DAVID  
CHRISTENSEN, CAROL SMITH, LOUISE  
STEMLER, JASON MARTIN, JASON RICHER,  
ALEX COSTA, RISA KLEMME, NIKKI RYMER,  
and DOES I-X inclusive,  
  
Defendants.

Case No. C23-1326-BJR-SKV

**AGREED STIPULATION AND  
(PROPOSED) ORDER  
EXTENDING CASE SCHEDULE  
DEADLINES**

**Noted for Consideration:  
August 27, 2024**

**I. STIPULATION**

For good cause shown and pursuant to the Court’s Order Extending the Case Scheduling  
Deadlines, Dkt.10, all parties to this matter stipulate as follows:

1. The parties have been actively engaged in discovery in this matter, including exchange of written interrogatories and request for production. The parties intend to engage in depositions of fact witnesses and parties.
2. The current expert discovery deadline is September 20, 2024. Due to the breadth of discovery sought and the need for reviewing and redacting records sought by the parties, the parties will

**AGREED STIPULATION AND ~~(PROPOSED)~~  
ORDER EXTENDING CASE SCHEDULE  
DEADLINES**  
Case No. C23-1326-BJR-SKV – 1

*LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.*  
ATTORNEYS AT LAW  
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(360) 754-3480 FAX: (360) 357-3511

1 need additional time to complete discovery. The parties anticipate that an additional three (3) months  
2 from the current deadline will be sufficient. The parties do not anticipate any further extensions of this  
3 Court's deadlines.

4 3. The parties agree that the purpose of this extension is to allow more time to review,  
5 redact, and produce responsive records sought by the parties. The parties agree that no further written  
6 discovery will be propounded after this Court's current discovery deadline of September 20, 2024.

7 3. Extending the discovery deadline will make it difficult to maintain the remaining dates on  
8 the case schedule order, including expert related motions and dispositive motions, as well the ability to  
9 evaluate the case for potential pretrial mediation. Therefore, the parties request that all remaining dates  
10 on the case schedule also be extended as follows:  
11

EVENT	CURRENT DEADLINE	NEW DEADLINE
Discovery Motions	August 26, 2024	November 26, 2024
Discovery Deadline	September 20, 2024	December 20, 2025
Dispositive Motions	October 21, 2024	January 21, 2025
Motions in Limine	February 12, 2025	May 12, 2025
Joint Pretrial Statement	February 19, 2025	May 19, 2025
Jury Trial	March 17, 2025	June 17, 2025

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21 STIPULATED TO THIS 27<sup>th</sup> DAY OF August 2024.

22 LAW, LYMAN, DANIEL, KAMERRER  
23 & BOGDANOVICH, P.S.

24 */s/ John E. Justice*

25 John E. Justice, WSBA No. 23042  
26 Attorney for Defendants  
P.O. Box 11880, Olympia, WA 98508

**AGREED STIPULATION AND ~~(PROPOSED)~~  
ORDER EXTENDING CASE SCHEDULE  
DEADLINES**

**Case No. C23-1326-BJR-SKV – 2**

LAW, LYMAN, DANIEL,  
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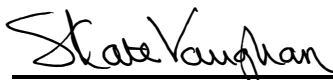
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2 [jjustice@lldkb.com](mailto:jjustice@lldkb.com)  
3 /s/ *Darryl Parker*  
4 Darryl Parker, WSBA No. 30770  
5 Attorney for Plaintiff  
6 CIVIL RIGHTS JUSTICE CENTER PLLC  
7 1833 N 105th Street, Suite 201  
8 Seattle, WA 98133  
9 [dparker@civilrightsjusticecenter.com](mailto:dparker@civilrightsjusticecenter.com)

8 **ORDER**

9 Pursuant to the stipulation of the parties, and for good cause shown, the Case Schedule Order is  
10 modified as follows:

11 <b>EVENT</b>	<b>CURRENT DEADLINE</b>	<b>NEW DEADLINE</b>
12 Discovery Motions	August 26, 2024	November 26, 2024
13 Discovery Deadline	September 20, 2024	December 20, 2024
14 Dispositive Motions	October 21, 2024	January 21, 2025
15 Motions in Limine	February 12, 2025	May 7, 2025
16 Joint Pretrial Statement	February 19, 2025	May 19, 2025
17 Pretrial Conference	March 4, 2025 at 10:30 am	June 3, 2025 at 10:30 am
18 Jury Trial	March 17, 2025	June 16, 2025

21 DONE THIS 28th DAY OF August, 2024

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24 S. KATE VAUGHAN  
25 United States Magistrate Judge  
26

**AGREED STIPULATION AND ~~(PROPOSED)~~  
ORDER EXTENDING CASE SCHEDULE  
DEADLINES**  
Case No. C23-1326-BJR-SKV – 3

LAW, LYMAN, DANIEL,  
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1 **CERTIFICATE OF FILING AND SERVICE**

2 I hereby certify under penalty of perjury under the laws of the United States of America that on  
3 this date, I caused to be electronically filed the foregoing document, and this Certificate of Filing & Service  
4 with the CM/ECF e-filing portal which will cause the same to be served on the following:

5 **Plaintiffs Attorney:**

6 Darryl Parker  
7 CIVIL RIGHTS JUSTICE CENTER PLLC  
8 1833 N 105th Street, Suite 201  
9 Seattle, WA 98133  
10 [dparker@civilrightsjusticecenter.com](mailto:dparker@civilrightsjusticecenter.com)

11 DATED this 27<sup>th</sup> day of August, 2024 at Tumwater, WA.

12 */s/ Lisa Gates*

13 \_\_\_\_\_  
14 Lisa Gates, Legal Assistant