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

MCKENNA DUFFY and MICHAEL BRETT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

YARDI SYSTEMS, INC., BRIDGE
PROPERTY MANAGEMENT, L.C.,
CALIBRATE PROPERTY MANAGEMENT,
LLC, DALTON MANAGEMENT, INC.,
HNN ASSOCIATES, LLC, LEFEVER
MATTSON PROPERTY MANAGEMENT,
MANCO ABBOTT, INC., MORGUARD
MANAGEMENT COMPANY; R.D.
MERRILL REAL ESTATE HOLDINGS,
LLC, SUMMIT MANAGEMENT
SERVICES, INC., and CREEKWOOD
PROPERTY CORPORATION,

Defendants.

Case No. 2:23-cv-01391-RSL

**STIPULATED MOTION RE:
SUBMISSION OF PROPOSED
AGREEMENT REGARDING THE
DISCOVERY OF ELECTRONICALLY
STORED INFORMATION**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs McKenna Duffy and Michael Brett (“Plaintiffs”) and Defendants Yardi Systems, Inc. (“Yardi”), Bridge Property Management, L.C. (“Bridge”), Calibrate Property Management LLC (“Calibrate”), Creekwood Property Corporation (“Creekwood”), Dalton Management, Inc. (“Dalton”), LeFever Mattson Property Management (“LeFever”), HNN Associates, LLC (“HNN”), Manco Abbott, Inc. (“Manco”), Morguard Management Company Inc. (“Morguard”), Summit Management Services, Inc. (“Summit”), and R.D. Merrill Real Estate Holdings, LLC (“Pillar

1 Properties”) (collectively “Defendants”), by and through their respective counsel, hereby
2 stipulate as follows:

3 1. WHEREAS, the Parties¹ submitted a stipulated motion to extend the deadlines for
4 submitting a proposed agreement regarding the Discovery of Electronically Stored Information
5 (“ESI Protocol”) and a proposed Protective Order to April 1, 2024. ECF No. 145.

6 2. WHEREAS, this Court granted the Parties’ stipulated motion and ordered the
7 Parties to present a Protective Order and an ESI Protocol no later than April 1, 2024. ECF. No.
8 147.

9 3. WHEREAS, the Parties submitted a stipulated motion to extend the April 1, 2024
10 deadline to submit an ESI Protocol to April 26, 2024. ECF No. 160.

11 4. WHEREAS, this Court granted the Parties’ stipulated motion and ordered the
12 Parties to present an ESI Protocol no later than April 26, 2024. ECF. No. 161.

13 5. WHEREAS, the Parties have continued to meet and confer regarding the ESI
14 Protocol, the Parties continue to narrow the issues in dispute, the Parties would benefit from
15 more time to either reach agreement or narrow the scope of any disputed issues, and, subject to
16 the Court’s approval, have agreed to continue the deadline for submitting an ESI Protocol until
17 May 6, 2024;


18 THEREFORE, the Parties STIPULATE AND AGREE that:

19 The Parties will present an ESI Protocol, as well as any related disputed issues, by no
20 later than May 6, 2024.

21 STIPULATED to this 25th day of April, 2024.

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 Dated this 26th day of April, 2024.

24 

25 Robert S. Lasnik
26 United States District Court Judge

27 ¹ Defendants and Plaintiffs are collectively referred to as the “Parties.”

1 RESPECTFULLY SUBMITTED,
2

3 **HAGENS BERMAN SOBOL SHAPIRO**
4 **LLP**

4 /s/ Steve W. Berman

5 Steve W. Berman (WSBA No. 12536)
6 Theodore Wojcik (WSBA No. 55553)
7 Stephanie A. Verdoia (WSBA No. 58636)
8 Xiaoyi Fan (WSBA No. 56703)
9 1301 Second Avenue, Suite 2000
10 Seattle, WA 98101
11 Telephone: (206) 623-7292
12 Facsimile: (206) 623-0594
13 Email: steve@hbsslw.com
14 Email: tedw@hbsslw.com
15 Email: stephaniev@hbsslw.com
16 Email: kellyf@hbsslw.com

17 Rio S. Pierce (*pro hac vice*)
18 715 Hearst Avenue, Suite 300
19 Berkeley, CA 94710
20 Telephone: (510) 725-3000
21 Facsimile: (510) 725-3001
22 Email: riop@hbsslw.com

23 *Attorneys for Plaintiffs MCKENNA DUFFY*
24 *and MICHAEL BRETT*

VAN KAMPEN & CROWE PLLC

/s/ Al Van Kampen

Al Van Kampen (WSBA No. 13670)
P.O. BOX 33632
Seattle, WA 98133
Telephone: (206) 441-1121
Email: avankampen@vkclaw.com

VINSON & ELKINS LLP

Michael W. Scarborough (*pro hac vice*)
Dylan I. Ballard (*pro hac vice*)
M. Kevin Costello (*pro hac vice*)
Madison Lo (*pro hac vice*)
555 Mission Street, Suite 2000
San Francisco, CA 94105
Telephone: (415) 979-6900
Email: mscarborough@velaw.com
Email: dballard@velaw.com
Email: kcostello@velaw.com
Email: mlo@velaw.com

Stephen Medlock (*pro hac vice*)
2200 Pennsylvania Avenue NW
Suite 500 West
Washington, DC 20037
Telephone: (202) 639-6500
Email: smedlock@velaw.com

Mackenzie Newman (*pro hac vice*)
1114 Avenue of the Americas
32nd Floor
New York, NY 10036
Telephone: (212) 237-0000
Email: mnewman@velaw.com

Attorneys for Defendant Bridge Property
Management, L.C.

1
2 **BAILEY DUQUETTE PC**

3 /s/ Hozaiifa Cassubhai

4 Hozaiifa Cassubhai (WSBN No. 39512)
5 William Burnside (WSBN No. 36002)
6 800 Fifth Ave, Suite 101-800
7 Seattle, WA 98104
8 Phone: (206) 225-2250
9 Fax : (866) 233-5869
10 Email: hozaiifa@baileyduquette.com
11 will@baileyduquette.com

12 *Attorneys for Defendant Calibrate Property*
13 *Management, LLC*

14 **FOGARTY LAW GROUP PLLC**

15 /s/ Paul E. Fogarty

16 Paul E. Fogarty (WSBN No. 26929)
17 1904 Third Avenue, Ste 933
18 Seattle, WA 98101
19 Telephone: (206) 441-0172
20 Email: pfogarty@fogartylawgroup.com

21 **NORTON ROSE FULBRIGHT US LLP**

22 Michael Swartzendruber (*pro hac vice*)
23 2200 Ross Avenue, Suite 3600
24 Dallas, Texas 75201
25 Telephone: 214-855-8067
26 Email: michael.swartzendruber@
27 nortonrosefulbright.com

28 Eliot Turner (*pro hac vice*)
1301 McKinney, Suite 5100
Houston, TX 77010
Telephone: 713-651-5113
Email:
eliot.turner@nortonrosefulbright.com

Attorneys for Defendant Creekwood
Property Corporation

CABLE HUSTON LLP

/s/ Brian S. Epley

Brian S. Epley (WSBA No. 48412)
Jon W. Monson (WSBA No. 43912)
1455 SW Boadway, Suite 1500
Portland, OR 97201-3412
Telephone: (503) 224-3092
Email: jmonson@cablehuston.com
Email: bepley@cablehuston.com

Attorneys for Defendant Dalton Management, Inc.

PERKINS COIE LLP

/s/ David A. Perez

David A. Perez (WSBA No. 43959)
Elvira Castillo (WSBA No. 43893)
Tiffany Lee (WSBA No. 51979)
Marten King (WSBA No. 57106)
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.6767
Email: DPerez@perkinscoie.com
Email: ECastillo@perkinscoie.com
Email: TiffanyLee@perkinscoie.com
Email: MKing@perkinscoie.com

Adrianna Simonelli (WSBA No. 58472)
1120 NW Couch Street, Tenth Floor
Portland, OR 97209-4128
Telephone: 503-727-2000
Facsimile: 503-727-2222
Email: ASimonelli@perkinscoie.com

Attorneys for Defendant HNN Associates, LLC

1
2 **SHOOK, HARDY & BACON L.L.P.**

3 /s/ Steven Rich

4 Steven Rich (WSBA No. 48444)
5 701 Fifth Avenue, Suite 6800
6 Seattle, Washington 98104
7 Telephone: (206) 344.7600
8 Email: srich@shb.com

9 Ryan Sandrock (*pro hac vice*)
10 555 Mission Street Suite 2300
11 San Francisco, California 94105
12 Telephone: (415) 544.1900
13 Email: rsandrock@shb.com

14 *Attorneys for Defendant LeFever Mattson*

15 **STOKES LAWRENCE, P.S.**

16 /s/ Valerie Walker

17 Valerie Walker (WSBA No. 52584)
18 Mathew Harrington (WSBA No. 33276)
19 1420 Fifth Avenue, Suite 3000
20 Seattle, WA 98101-2393
21 Telephone: (206) 626-6000
22 Email: Mathew.Harrington@stokeslaw.com
23 Email: Valerie.Walker@stokeslaw.com

24 **SPENCER FANE LLP**

25 Jessica Nelson (*pro hac vice*)
26 Donald Heeman (*pro hac vice*)
27 100 South Fifth Street, Suite 2500
28 Minneapolis, MN 55402
Telephone: (612) 268-7006
Email: jnelson@spencerfane.com
Email: dheeman@spencerfane.com

Attorneys for Defendant Manco Abbott, Inc.

K&L GATES LLP

/s/ Christopher M. Wyant

Christopher M. Wyant (WSBA No. 35561)
Tyler Lichter (WSBA No. 51090)
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Phone: (206) 623-7580
Fax: (206) 623-7022
Email: chris.wyant@klgates.com
tyler.lichter@klgates.com

Lauren Norris Donahue (*pro hac vice*)
70 W. Madison St., Ste. 3300
Chicago, IL 60602
Telephone: (312) 372-1121
Fax: (312) 827-8000
Email: lauren.donahue@klgates.com

Derek Sutton (*pro hac vice*)
301 Hillsborough St., Suite 1200
Raleigh, NC 27603
Telephone: (919) 743-7331
Fax: (919) 516-2122
Email: derek.sutton@klgates.com

*Attorneys for Defendant R.D. Merrill
Real Estate Holdings, LLC*

BRADLEY BERNSTEIN SANDS LLP

/s/ Heidi B. Bradley

Heidi B. Bradley (WSBA No. 35759)
2800 First Avenue, Suite 326
Seattle, WA 98121
Telephone: (206) 337-6551
Email: hbradley@bradleybernstein.com

Attorney for Defendant Morguard Corporation

1
2 **GORDON REES SCULLY
MANSUKHANI, LLP**

3 /s/ Todd A. Bowers

4 Todd A. Bowers (WSBA No. 24638)
5 701 5th Avenue, Suite 2100
6 Seattle, WA 98104
7 Telephone: (206) 695-5197
8 Email: tbowers@grsm.com

9 **ROETZEL & ANDRESS**

10 Stephen W. Funk (*pro hac vice*)
11 222 South Main Street, Suite 400
12 Akron, OH 44308
13 Telephone: (330) 849-6602
14 Cell: (330) 819-5387
15 Email: sfunk@ralaw.com

16 *Attorneys for Defendant Summit
17 Management Services, Inc.*

**MATTHEW CARVALHO,
ATTORNEY AT LAW, PLLC**

/s/ Matthew A. Carvalho

Matthew A. Carvalho (WSBA No. 31201)
720 Seneca Street
Seattle, WA 98101
Telephone: (206) 799-6888
Email: matt@mattcarvalholaw.com

DEBEVOISE & PLIMPTON LLP

Maura K. Monaghan (*pro hac vice*)
Michael Schaper (*pro hac vice*)
Kristin D. Kiehn (*pro hac vice*)
66 Hudson Boulevard
New York, NY 10001
Telephone: (212) 909-6000
Email: mkmonaghan@debevoise.com
Email: mschaper@debevoise.com
Email: kdkiehn@debevoise.com

Abraham Tabaie (*pro hac vice*)
650 California Street
San Francisco, CA 94108
Telephone: (415) 738-5700
Email: atabaie@debevoise.com

Attorneys for Defendant Yardi Systems, Inc.