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HON. KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

O.E., an individual,

Plaintiff,

v.

HPT TRS IHG-2, INC., a Maryland corporation; SONESTA INTERNATIONAL HOTELS CORPORATION, a Massachusetts Corporation; and ABRDURAKHMON MUKHAMMADJONOV, an individual,

Defendants.

Case No. 2:23-cv-01748-KKE

STIPULATION AND ORDER RE:
PRODUCTION OF DOCUMENTS AND
PRODUCTION OF ELECTRONIC
DEVICES FOR FORENSIC
EXAMINATION

STIPULATION

Plaintiff O.E. (“**Plaintiff**”), and Defendants HBT TRS IHG-2, Inc. and Sonesta International Hotels Corporation (“**the Sonesta Defendants**”), stipulate to the following order which, if granted shall resolve the Sonesta Defendants pending Motion to Compel Production of Documents and Production of Electronic Devices for Forensic Examination (“**the Motion**”).

(1) Plaintiff shall produce all of her text messages (including any stored in a cloud system), from any cellular telephone or other device used by Plaintiff at any time from September 30, 2022, to the present;

STIPULATED ORDER RE PRODUCTION OF DOCUMENTS AND PRODUCTION OF ELECTRONIC DEVICES FOR FORENSIC EXAMINATION - 1
(2:23-cv-01748-KKE)

1 (2) Plaintiff shall produce all cellular devices used by Plaintiff during that time for
2 purposes of a forensic examination by Leatha and Associates, who will return all devices to
3 Plaintiff's attorneys that same day;

4 (3) Leatha and Associates will segregate any text messages which include counsel for
5 Plaintiff and privilege has not been waived by including a third party;

6 (4) Counsel for the Sonesta Defendants will review the non-privileged texts and
7 identify messages it believes should be produced;

8 (5) Counsel for Plaintiff shall within fifteen (15) days thereafter identify any texts
9 identified by Sonesta for production that it believes are privileged;

10 (6) If the parties cannot agree on any particular privilege issue, they may bring the
11 matter to the Court's attention for resolution;

12 (7) The cost of the forensic examination by Leatha and Associates shall be borne
13 equally by both sides;

14 (8) Each side will bear its own attorney's fees in connection with the Motion; and

15 (9) Sonesta does not waive any issue or argument it may have regarding potential
16 spoliation of evidence, and Plaintiff does not waiver her right to oppose any such issue or
17 argument.

18 Plaintiff and the Sonesta Defendants agree to such an order being entered.

19 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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21 DATED: March 5, 2025.
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1 LAW OFFICES OF LOURDES SANCHEZ, STOEL RIVES LLP
2 PC

3 *s/ Apolinar Montero-Sanchez (via email*
4 *authorization)*

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Attorneys for Defendants
HPT TRS IHG-2, Inc. and
Sonesta International Hotels Corporation

ORDER

The parties' stipulated motion (Dkt. No. 51) is GRANTED. As the parties have resolved the dispute that led to the filing of Defendants' motion to compel (Dkt. No. 39), the Court now DENIES that motion as moot.

Dated this 5th day of March, 2025.



Kimberly K. Evanson
United States District Judge