

DISTRICT JUDGE MARSHA J. PECHMAN

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JANE DOE A, an individual, JANE DOE B individual, JANE DOE C, an individual, JANE DOE D, an individual,

Plaintiffs,

v.

Veer Hospitality Phoenix LLC; SeaTac Hotels, LLC; Evergreen Lodging Group, LLC; Madison Avenue P&L Enterprises, Inc.; G6 Hospitality, L.L.C.; G6 Hospitality IP, L.L.C.; G6 Hospitality Property, L.L.C.; G6 Hospitality Purchasing, L.L.C.; G6 Hospitality Franchising, L.L.C.; Motel 6 Operating, L.P.; HSK212, LLC; Wyndham Hotels and Resorts, Inc.; NITSI, LLC; Choice Hotels International, Inc.; and DOES 1-200, inclusive,

Defendants.

Case No. 2:24-cv-01270-MJP

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER TO EXTEND  
DEADLINES**

**NOTE ON MOTION CALENDAR:**  
November 22, 2024

Plaintiff Jane Doe A (“Plaintiff”) and Defendants G6 Hospitality LLC, G6 Hospitality IP LLC, G6 Hospitality Property LLC, G6 Hospitality Purchasing LLC, G6 Hospitality Franchising LLC, and Motel 6 Operating LP (together, the “G6 Defendants” and with Plaintiff, the “Parties”), stipulate and agree as follows and request that the Court enter an order consistent with the following:

1           1.     On August 16, 2024, Plaintiff filed her initial Complaint against, amongst other  
2 parties, the G6 Defendants. *See* Docket No. 1. On August 21, 2024, the G6 Defendants waived  
3 service of the Complaint. *See* Docket Nos. 9-13.

4           2.     On October 21, 2024, the G6 Defendants moved to sever and to dismiss Plaintiff's  
5 Complaint. *See* Docket Nos. 38, 40. On November 11, 2024, Plaintiff filed a stipulated motion for  
6 leave to file an amended complaint, which mooted the G6 Defendants' motions. *See* Docket No.  
7 72; *see also* Docket No. 77.

8           3.     On November 11, 2024, Plaintiff also filed her First Amended Complaint. *See*  
9 Docket No. 74.

10          4.     By operation of Federal Rule of Civil Procedure 15(a)(3), the G6 Defendants'  
11 response to the First Amended Complaint is due on November 25, 2024. In order to give the G6  
12 Defendants additional time to investigate the facts alleged in the First Amended Complaint and  
13 prepare an answer, the parties mutually agreed to extend the G6 Defendants' deadline to answer  
14 until December 9, 2024.

15          5.     Accordingly, the Parties respectively request that the Court set the G6 Defendants'  
16 deadline to answer Plaintiff's First Amended Complaint as December 9, 2024.

17          6.     By entering into this stipulation, the Parties hereto do not waive, and expressly  
18 preserve, all rights, remedies, and defenses.

1 Dated this 22nd day of November, 2024.

2 SINGLETON SCHREIBER, LLP

DLA PIPER LLP (US)

3 /s/ Meagan Verschueren

/s/ Austin Rainwater

4 Katie Llamas *PHV Applicant*

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5 Meagan Verschueren *PHV Applicant*

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*Attorneys for the G6 Defendants*

**ORDER**

IT IS SO ORDERED.

Dated this 25th day of November, 2024.



The Honorable Marsha J. Pechman  
United States District Judge

*PRESENTED BY:*

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/s/ Meagan Verschueren

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