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THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOSEPH SANT, MERTON CHUN,  
RONESHA SMITH, and HEATHER  
NICASTRO, individually and on behalf of all  
others similarly situated

Plaintiffs,

vs.

ROCKETREACH LLC,

Defendant.

Case No. 2:24-cv-1626-RSM

STIPULATED MOTION TO EXTEND  
RESPONSE AND REPLY DEADLINES  
PERTAINING TO DEFENDANT’S  
MOTION TO DISMISS, MOTION TO  
STRIKE, AND MOTION TO COMPEL  
ARBITRATION

**STIPULATION**

WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro (collectively, “Plaintiffs”) filed Case No. 2:24-cv-1626 against RocketReach LLC (“Defendant”) on October 8, 2024;

WHEREAS, Defendant was served with Plaintiffs’ Complaint on October 23, 2024;

WHEREAS, Defendant on December 27, 2024 filed a Motion to Dismiss (ECF No. 18), a Motion to Strike Class Allegations (ECF No. 19), and a Motion to Compel Arbitration and Stay Proceedings (ECF No. 16) (taken together, the “Motions”);

WHEREAS, Plaintiffs’ current deadline to respond to the Motions is February 11, 2025;

WHEREAS, Plaintiffs’ counsel has numerous interceding briefing deadlines and arguments in other matters before February 11, 2025;

WHEREAS, Defendant’s current deadline to reply to Plaintiffs’ anticipated responses is February 18, 2025;

1 WHEREAS, Defendant's counsel has numerous interceding briefing deadlines in other  
2 matters before February 18, 2025;

3 THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the  
4 deadline for Plaintiffs to respond to the Motions to March 13, 2025 and the deadline for Defendant  
5 to reply to Plaintiffs' anticipated responses to April 14, 2025. This stipulation shall not operate  
6 as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver or  
7 otherwise affect any right, defense, claim or objection by any party.

8 Stipulated to this 21st day of January, 2025.

9 Presented and stipulated to by:

10 NICK MAJOR LAW

11  
12 By: /s/ Nick Major  
13 Nick Major, WSBA #49579  
14 450 Alaskan Way S., #200  
15 Seattle, WA 98104  
16 Email: nick@nickmajorlaw.com  
17 *Attorneys for Plaintiffs*

18 HEDIN LLP

19 By: /s/ Tyler K. Somes  
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22 Washington, D.C. 20005  
23 Email: tsomes@hedinllp.com  
24 *Attorneys for Plaintiffs*

25 Stipulated to by:

26 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

27 By: /s/ Patrick G. Lynch  
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*Attorney for RocketReach LLC.*

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**ORDER**

IT IS SO ORDERED.

DATED this 27<sup>th</sup> day of January, 2025.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE