

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

AMRISH RAJAGOPALAN, MARIE
JOHNSON-PEREDO, ROBERT HEWSON,
and KAREN HEA, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

MERACORD, LLC; LINDA REMSBERG and
CHARLES REMSBERG, individually and on
behalf of the marital community,

Defendants.

CASE NO. 12-CV-05657-BHS

STIPULATION AND ORDER
RESETTING SUMMARY JUDGMENT
RELATED DEADLINES

WHEREAS, Meracord, the Remsberg Defendants, and Plaintiffs have filed motions for summary judgment;

WHEREAS, the Meracord's motion is currently noted for November 21, 2014;

WHEREAS, the Remsberg Defendants' motion is currently noted for November 28, 2014;

WHEREAS, Plaintiffs' motion is currently noted for December 5, 2014;

WHEREAS, a comprehensive briefing schedule is in the interest of the Court's convenience and judicial economy;

Pursuant to Local Rule 7, the parties in the above-captioned consolidated action hereby stipulate and agree and request that the Court ORDER:

- 1 1. That on December 5, 2014, Defendants respond to Plaintiffs' motion, and Plaintiffs
2 respond to Defendants' motions; and
3 2. That on December 19, 2014, Defendants file replies in support of their motions, and
4 Plaintiffs file a reply in support of their motion.

5 A proposed Order follows the parties' signatures.

6 Respectfully submitted this 12th day of November, 2014.

7 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

8 s/ Steve W. Berman

9 s/ Thomas E. Loeser

10 Steve W. Berman

11 Thomas E. Loeser

12 HAGENS BERMAN SOBOL SHAPIRO LLP

13 1918 Eighth Avenue, Suite 3300

14 Seattle, Washington 98101

15 steve@hbsslaw.com

16 TomL@hbsslaw.com

17 Stuart M Paynter (*pro hac vice*)

18 Celeste H.G. Boyd (*pro hac vice*)

19 THE PAYNTER LAW FIRM PLLC

20 1200 G Street N.W., Suite 800

21 Washington, DC 20005

22 stuart@smplegal.com

23 cboyd@smplegal.com

24 *Attorneys for Plaintiffs*

1 s/ Randall Thomsen
2 Angelo J. Calfo, WSBA #27079
3 Randall Thomsen WSBA #25310
4 CALFO HARRIGAN LEYH & EAKES, LLP
5 999 Third Avenue, Suite 4400
6 Seattle, WA 98104
7 angeloc@calfoharrigan.com
8 randallt@calfoharrigan.com

Attorney for Defendant Meracord, LLC

9 s/ H. Andrew Saller, Jr.
10 James A. Krueger, WSBA #3408
11 H. Andrew Saller, Jr., WSBA #12945
12 Lucy R. Clifthorne, WSBA #27687
13 VANDEBERG JOHNSON & GANDARA LLP
14 1201 Pacific Ave., Suite 1900,
15 Tacoma, WA 98402
16 Telephone: (253) 383-3791
17 Facsimile: (253) 383-6377
18 jkrueger@vjglaw.com
19 asaller@vjglaw.com
20 lclifthorne@vjglaw.com

Attorneys for Linda and Charles Remsberg

21 * * *

22 **ORDER**

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 DATED this 12th day of November, 2014.

25
26
27
28


BENJAMIN H. SETTLE
United States District Judge