

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MOLLY CHESTER,

Plaintiff,

vs

SMARTRECEIPT, INC., et al.,

Defendants.

NO. 13-05272 BHS

STIPULATED MOTION EXTENDING THE
STAY OF PROCEEDINGS

HEARING DATE: August 16, 2013

Plaintiff and Defendants through their respective attorneys respectfully request that the Court enter an order staying this matter for two weeks due to Plaintiff's counsel's unavailability because of an out-of-town trial.

As previously explained to the Court in the July 26, 2013 stipulated motion for stay of all proceedings, the parties' settlement discussions have continued and the parties believe that an agreement has been reached on key settlement terms. However, due to counsel for Plaintiff's unavailability due to an out-of-town trial in late August, additional time may be required to finalize settlement-related documents. The proposed stay will conserve party and judicial resources and permit the parties to focus on finalizing the settlement terms in a written agreement.

STIPULATED MOT AND ORDER TO STAY PROCEEDINGS - 1 of 3
[100072781]

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1 For the reasons stated above, Plaintiff and Defendants request that the Court
2 enter an order staying all deadlines in this matter including the FRCP 26(f) conference,
3 Initial Disclosures, the Joint Status Report Plaintiff's deadline to respond to Defendants
4 Howe and Kanowsky's pending motions (*Dkt. 17* and *Dkt. 19*) through September 10,
5 2013. Defendants Eric Kanowsky and Michael Howe enter into this Stipulation for the
6 reasons stated above, but expressly reserve all applicable defenses, including but not
7 limited to those related to personal jurisdiction as set forth in the motions to dismiss at
8 Dkt. Nos. 17 and 19.
9

10 Dated this ___ day of August, 2013.

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26 STIPULATED MOT AND ORDER TO STAY PROCEEDINGS - 2 of 3
[100072784]

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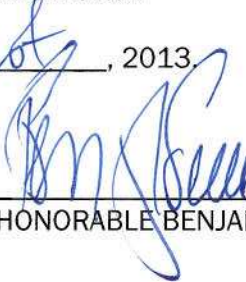
ORDER

This matter having come before the Court based on the Stipulation set forth above, the Court having reviewed the records and files herein and being fully advised in the premises, it is hereby

ORDERED that this matter is stayed until September 10, 2013.

IT IS FURTHER ORDERED that on or before September 10, 2013, the Parties shall report to the Court regarding the status of this matter.

DATED this 20 day of August, 2013



THE HONORABLE BENJAMIN H. SETTLE

APPROVED FOR ENTRY:

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