

1 THE HONORABLE MICHELLE L. PETERSON
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 BRYAN ESMOND, RONALD MORAN, and
11 JOSEPH NETTLES,

12 Plaintiffs,

13 v.

14 BRIDGEVIEW FINANCE LLC, and SARAH
15 REARDON,

16 Defendants.

17 Case No. 3:23-cv-05664-MLP

18 **STIPULATED MOTION TO EXTEND
19 ALL DEADLINES**

20 NOTE ON MOTION CALENDAR:
21 November 13, 2023

22 **STIPULATION**

23 Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs, Bryan Esmond, Ronald Moran,
24 and Joseph Nettles, and Defendants, Bridgeview Finance, LLC and Sarah Reardon (together “the
25 Parties”), STIPULATE AND AGREE to extend all deadlines, including the deadline for
26 Defendants to move, answer, or otherwise respond to the Complaint, to November 20, 2023.

27 The stipulation is based on the following:

28 WHEREAS, Plaintiffs filed their Complaint in this action on July 24, 2023;

29 WHEREAS, since the Complaint was filed Counsel for the Parties have engaged in
30 significant discussions regarding resolving this matter and the Parties remain hopeful that a
31 resolution will be reached soon. The Parties believe an additional brief extension of time will

32 STIPULATED MOTION TO EXTEND ALL
33 DEADLINES - 1
34 (Case No. 3:23-cv-05664-MLP)

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1 further assist good faith discussions and determine whether a resolution can be reached and, if so,
2 to agree on the principal terms of such a resolution;

3 WHEREAS, the previous Stipulated Motion to Extend All Deadlines (Dkt. No. 18)
4 extended all of the dates in the Court's Initial Scheduling Order (Dkt. No. 12) to November 27,
5 2023 and the deadline for Defendants to move, answer, or otherwise respond to Plaintiff's
6 Complaint to November 13, 2023;

7 WHEREAS, in order to provide the Parties with additional time to attempt to resolve this
8 matter without the unnecessary time and costs associated with a response to Plaintiffs' Complaint,
9 the Parties stipulate and agree that the deadline for Defendants to move, answer, or otherwise
10 respond to Plaintiff's Complaint will be November 20, 2023;

11 WHEREAS, the granting of this Motion will not prejudice any party, as Plaintiffs have
12 agreed to this extension, and this extension is being sought in good faith and not for delay or any
13 other improper purpose.

14 NOW THEREFORE, the Parties stipulate to the following:

15 1. To extend the deadline for Defendants to move, answer, or otherwise respond to
16 the Complaint to **November 20, 2023**.

17 2. The Parties agree to complete their deadlines for an FRCP 26(f) Conference,
18 Inidital Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1), and Combined Joint Status Report and
19 Discovery Plan as Required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) by **December 4,**
20 **2023.**

21 3. This Stipulation and Order shall not operate as an admissison of any factual
22 allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim
23 or objection.

24 **STIPULATED AND AGREED TO** this 13th day of November, 2023.
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