

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

KNOCKFIERNA, LLC,

Plaintiff,

No. 3:24-cv-05873

v.

CITY OF SHELTON,

Defendant.

STIPULATION AND ORDER SETTING
BRIEFING SCHEDULE FOR
SUMMARY JUDGMENT AND
MODIFYING DISCOVERY
DEADLINES

I. INTRODUCTION

WHEREAS, the parties have conferred on more than one occasion about the nature and posture of the case; and

WHEREAS, the parties believe this case is subject to a number of gateway legal issues, which do not require substantial discovery; and

WHEREAS, the parties desire to efficiently adjudicate this case in a manner that minimizes needless costs and delay; and

WHEREAS, the parties also desire to minimize redundant and unhelpful briefing which are often attendant to cross-motions; and

WHEREAS, the parties have crafted a summary judgment briefing schedule that differs from the Court's standing order, which they are now submitting for the Court's consideration.

ORDER

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1 **II. STIPULATION**

2 The parties hereby stipulate to the following summary judgment briefing schedule:

3 **PLAINTIFF'S MOTION FOR**
4 **SUMMARY JUDGMENT**

March 14, 2025

5 **DEFENDANT'S OMNIBUS RESPONSE**
6 **BRIEF AND CROSS-MOTION FOR**
7 **SUMMARY JUDGMENT**

April 4, 2025

8 **PLAINTIFF'S RESPONSE OMNIBUS**
9 **RESPONSE BRIEF AND REPLY BRIEF**

April 11, 2025

10 **DEFENDANT'S REPLY BRIEF**

April 18, 2025

11 The parties further stipulate that, following the Court's ruling on the summary judgment
12 cross-motions, if the case is not dismissed, they shall confer and submit a joint status report
13 recommending discovery and trial-related deadlines.
14

15 **SO STIPULATED.**

16 **KELLER ROHRBACK L.L.P.**

17 By s/ Adam L. Rosenberg
18 Adam L. Rosenberg, WSBA #39256
19 *Attorneys for Defendant*

20 **MAYNARD LAW, PLLC**

21
22 By s/ Jackson Maynard, Jr.
23 Jackson Maynard, Jr., WSBA #43481
Attorneys for Plaintiff

1 **III. ORDER**

2 The Court, finding good cause, hereby ADOPTS the above briefing schedule and
3 ORDERS that, if the case survives summary judgment, the parties shall submit a joint status
4 report recommending discovery and trial-related deadlines.

5 SO ORDERED.

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8 DONE this 12th day of March 2025.

9
10 

11 JUDGE BARBARA J. ROTHSTEIN

12
13 Presented by:

14
15 KELLER ROHRBACK L.L.P.

16 By s/ Adam L. Rosenberg

17 Adam L. Rosenberg, WSBA #39256
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24 4910-3330-1795, v. 3