

The Honorable Robert S. Lasnik

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUSAN SOTO PALMER et al.,
Plaintiffs,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,
Defendants,

and

JOSE TREVINO et al.,
Intervenor-Defendants.

Case No.: 3:22-cv-5035-RSL

INTERVENOR-DEFENDANTS’ AND
CROSS-PLAINTIFFS’ MOTION TO
EXPEDITE CONSIDERATION OF
RENEWED MOTION TO STAY
PROCEEDINGS

NOTE ON MOTION CALENDAR:
January 5, 2022

Pursuant to the Court’s inherent power “to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for the litigants,” *Landis v N. Am. Co.*, 299 U.S. 248, 254 (1936), Intervenor-Defendants and Cross-Plaintiffs Jose A. Trevino, Ismael G. Campos, and Alex Ybarra respectfully move this Court for expedited briefing and consideration of their Renewed Motion to Stay Proceedings (Dkt. # 123). Because dispositive motions are currently due on January 31, 2023, it would be a waste of time and resources for the Parties to prepare motions for summary judgment if the Court decides to grant the requested stay. Therefore, good cause exists for this Court to note Intervenor-Defendants’ and Cross-Plaintiffs’ Renewed Motion to Stay Proceedings for consideration on January 13, 2023, and set a briefing

1 schedule for the Renewed Motion as though it were a “Second Friday Motion” under LCR 7(d)(2),
2 so that the Court can determine whether to grant the Renewed Motion before the Parties expend
3 additional resources preparing dispositive briefing in this case that would be rendered unnecessary
4 in the event that the requested stay is granted.

5
6 DATED this 5th day of January, 2023.

7 Respectfully submitted,

8 s/ Andrew R. Stokesbary

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*Counsel for Intervenor-Defendants and
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court of the United States District Court for the Western District of Washington through the Court’s CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 5th day of January, 2023.

Respectfully submitted,
s/ Andrew R. Stokesbary
Andrew R. Stokesbary, WSBA No. 46097

*Counsel for Intervenor-Defendants and
Cross-Plaintiffs*

The Honorable Robert S. Lasnik

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JOSE TREVINO et al.,
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Case No.: 3:22-cv-5035-RSL

**[PROPOSED] ORDER GRANTING
INTERVENOR-DEFENDANTS’ AND
CROSS-PLAINTIFFS’ MOTION TO
EXPEDITE CONSIDERATION OF
RENEWED MOTION TO STAY
PROCEEDINGS**

Before the Court is Intervenor-Defendants and Cross-Plaintiffs Jose A. Trevino, Ismael G. Campos, and Alex Ybarra’s Motion to Expedite Consideration of their Renewed Motion to Stay Proceedings (Dkt. # 124). Having reviewed the record in this matter and the Motion, the Court finds that good cause exists to grant the Motion to Expedite Consideration.

Accordingly, IT IS HEREBY ORDERED that Intervenor-Defendants’ Renewed Motion to Stay Proceedings (Dkt. # 123) shall be noted for consideration on January 13, 2023.

DATED this _____ day of January, 2023.

The Honorable Robert S. Lasnik
UNITED STATES DISTRICT JUDGE

1 Presented by:

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DATED this 5th day of January, 2023.

Respectfully submitted,

s/ Andrew R. Stokesbary
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*Counsel for Intervenor-Defendants and
Cross-Plaintiffs*

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