

The Honorable Robert S. Lasnik

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

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

STIPULATED MOTION AND
[PROPOSED] ORDER TO ALLOW
DEPOSITIONS OUT OF TIME AND
EXTENSION OF WRITTEN DISCOVERY
RESPONSES

NOTE ON MOTION CALENDAR:
December 29, 2022

Pursuant to Local Rule 7(d)(1), Plaintiffs, Defendant/Cross-Defendant State of Washington, Defendant/Cross-Defendant Secretary Hobbs, and Intervenor-Defendants/Cross-Plaintiffs, (collectively the “Parties”) hereby stipulate and request the Court adjust the dates associated with the close of discovery as follows:

1. The Parties were prepared to take the depositions of Intervenor-Defendant Jose Trevino, Plaintiff Susan Soto Palmer, and Dr. Matt Barreto within the timeframe set by the Court’s Scheduling Order (Dkt. # 93). However, because of pre-existing family, work, and travel commitments, the Parties are not able to depose the above witnesses before the Court’s January 1, 2023 deadline.

1 2. The Parties have discussed and agreed to the following dates to conduct the
2 depositions:

- 3 A. Jose Trevino on January 9, 2023;
4 B. Susan Soto Palmer on January 10, 2023; and
5 D. Dr. Matt Barreto on January 23, 2023.

6 3. The Parties have also discussed and agreed to an extension of all pending written
7 discovery responses and related motions. The Parties' proposed extensions are as follows:

8 A. All written discovery responses, including requests for production, requests
9 for admissions, and interrogatories, that are presently served upon the Parties, by other Parties,
10 shall be due to the requesting party by January 6, 2023; and

11 B. All motions regarding written discovery shall be filed with the Court no
12 later than January 10, 2023.

13 4. The Parties are not requesting an extension of the dipositive motion deadline.

14 Based on the foregoing, the Parties stipulate and agree that good cause exists to conduct
15 these depositions after the January 1, 2023 deadline; to extend all pending written discovery
16 deadlines to January 6, 2023; and to extend the deadline to file any motions regarding discovery
17 to January 10, 2023.

18 IT IS SO ORDERED.

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20 ISSUED this _____ day of _____, 202__.

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24 HON. ROBERT S. LASNIK
25 UNITED STATES DISTRICT JUDGE
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1 Presented by:

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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 29th day of December, 2022.

Respectfully submitted,

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