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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER, a Washington nonprofit corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF JUSTICE; and its component, DRUG ENFORCEMENT ADMINISTRATION,

Defendants.

Case No. 2:20-cv-00674-JHC

PARTIES' STIPULATED MOTION TO EXTEND FILING DEADLINE FOR PLAINTIFF'S MOTION FOR FEES AND COSTS & ORDER

STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Human Rights Defense Center ("Plaintiff") and Defendants Department of Justice and Drug Enforcement Administration (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file its motion for attorneys' fees and costs. Specifically, the Parties request an additional 60-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	June 24, 2024	August 23, 2024

Thus far, Plaintiff submitted a settlement offer on June 14, 2024, which Defendants are still reviewing. Therefore, there is good cause to extend this deadline because the parties PARTIES' STIPULATED MOTION FOR EXTENSION & ORDER - 1 (No. 2:20-cv-00674-JHC)

1	are still currently negotiating a potential resolution and settlement, which if successful, would		
2	obviate the need for expenditure of further litigant and judicial resources. Good cause also		
3	exists because there is no prejudice towards any party. Accordingly, the Parties respectfully		
4	request the Court grant this Motion.		
5	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD		
6	I certify that this paper contains 151 words, in compliance with Local Civil Rule		
7	7(e)(1).		
8	DATED this 17 th day of June, 20	24.	
9 10	TESSA M. GORMAN United States Attorney	DAVIS WRIGHT TREMAINE LLP	
11	By <u>s/ <i>Kyle Forsyth</i></u> KYLE FORSYTH, WSBA #34609	By <u>s/ Caesar Kalinowski IV</u> Eric M. Stahl, WSBA #27619	
12	Assistant United States Attorney United States Attorney's Office	Caesar Kalinowski IV, WSBA #52650 DAVIS WRIGHT TREMAINE LLP	
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17	Intorney for Teacrai Defendants	G	
18		EJ Hurst, Admitted <i>Pro Hac Vice</i> HUMAN RIGHTS DEFENSE CENTER	
19		P.O. Box 1151 Lake Worth, FL 33460	
20		Telephone: 561-360-2523	
21		Email: ejhurst@humanrightsdefensecenter.org	
22		Attorneys for Plaintiff	
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PARTIES' STIPULATED MOTION FOR EXTENSION & ORDER - 2 (No. 2:20-cv-00674-JHC)

ORDER IT IS SO ORDERED. Dated this 17th day of June, 2024. John H. Chun JOHN H. CHUN United States District Judge