

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT WASHINGTON  
AT SEATTLE

GAVEN PICCIANO,

Plaintiff,

vs.

CLARK COUNTY, CLARK COUNTY  
JAIL, WELLPATH, LLC, and NAPHCARE,  
INC.

Defendants.

**NO. 3:20-cv-06106-RAJ**

**JOINT MOTION FOR STAY**

The parties jointly move this Court for a stay on discovery until such time as the Court rules on Defendant Wellpath, LLC's pending Motion to Dismiss. In support thereof the parties state as follows:

- 1) On January 6, 2021, the Court entered a Scheduling Order in this matter at Docket 18.
- 2) After discovery commenced, Plaintiff discovered that at the time Plaintiff entered Clark County Jail, and for the first few days thereafter, Wellpath, LLC was the entity under contract with Defendant Clark County to provide medical services at Clark County Jail. Thereafter, Defendant NaphCare, Inc. took over provision of medical services at Clark County Jail.
- 3) Therefore, on April 5, 2021, Plaintiff filed an Unopposed Motion to Join Wellpath, LLC as a Defendant in this matter.

- 1 4) The Court granted Plaintiff's Motion to Join Wellpath, LLC as a Defendant [Dckt.  
2 26] and on April 8, 2021, the Plaintiff filed his First Amended Complaint [Dckt. 27]  
3 to name Wellpath, LLC as an additional defendant in this matter.
- 4 5) The parties postponed previously scheduled depositions to allow an opportunity for  
5 Defendant Wellpath, LLC to appear in the case and so that Wellpath, LLC could  
6 participate in any depositions in this matter.
- 7 6) On May 3, 2021, Defendant Wellpath, LLC filed a Motion to Dismiss. Plaintiff  
8 timely filed a brief in opposition, and Defendant Wellpath, LLC timely filed a reply.  
9 The matter was fully briefed as of June 4, 2021.
- 10 7) Until such time as the Court rules on the Motion to Dismiss, the parties cannot  
11 proceed with discovery.
- 12 Therefore, for good cause stated, the parties jointly request that all deadlines be  
13 stayed until such time as the Court rules on the pending Motion to Dismiss. The  
14 parties propose that within ten days after the Court enters an Order on Defendant  
15 Wellpath, LLC's Motion to Dismiss, the parties jointly submit a revised proposed  
16 Scheduling Order.

17 DATED THIS 15th day of June, 2021.

18 By:

19 /s/ Conrad Reynoldson  
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20 **Attorney for Defendant Wellpath, LLC**

**CERTIFICATE OF SERVICE**

The foregoing was served via the Court's ECF system on June 15, 2021, on the following:

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*s/Marielle Maxwell*  
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