

THE HONORABLE STANLEY A. BASTIAN

NICHOLAS B. STRALEY  
MELISSA R. LEE  
RHONA TAYLOR  
COLUMBIA LEGAL SERVICES  
Institutions Project  
101 Yesler Way, Suite 300  
Seattle, WA 98104  
(206) 464-0838

DAVID R. CARLSON  
ANNA C. GUY  
DISABILITY RIGHTS WASHINGTON  
315 Fifth Avenue South, Suite 850  
Seattle, WA 98104  
(206) 324-1521

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

TERESA FARRIS, et al.,

Plaintiffs,

v.

FRANKLIN COUNTY et al.,

Defendants.

CLASS ACTION

No. 4:14-cv-05083-SAB

JOINT STATUS REPORT AND  
MOTION FOR STAY OF  
PROCEEDINGS

March 14, 2016 at 6:30 p.m.  
Without Oral Argument

Plaintiffs and Defendants (hereinafter the “Parties”) submit this joint status report and request that this Honorable Court stay further proceedings pursuant to

1 E.D.L.R. 7.1. As discussed herein, the Parties have resolved this matter through  
2 settlement. Accordingly, the Parties jointly move the Court to stay litigation in this  
3 matter. The Parties submit the following in support of their motion:

4 1. The Parties filed a joint motion for referral to a magistrate judge for  
5 settlement conference on December 8, 2015.

6 2. On December 15, 2015, Defendants submitted a motion to extend  
7 their deadline for expert reports from December 31, 2015 to January 31, 2016.  
8 Plaintiffs agreed with the motion.

9 3. On December 16, 2015, this Court granted the Parties' request and  
10 referred this matter to United States Magistrate Judge John T. Rodgers. The Court  
11 also granted Defendants' motion to extend the time for defense expert reports to  
12 January 31, 2016.

13 4. On December 8, 2016, United States Magistrate Judge Rodgers  
14 ordered the settlement conference to begin February 4, 2016.

15 5. Defendants submitted a motion to extend their deadline for two  
16 defense expert reports from January 31, 2016 to February 29, 2016. Plaintiffs did  
17 not object.

18 6. On January 25, 2016, this Court granted Defendants' motion to extend  
19 their expert report deadline to February 29, 2016.  
20

1           7.     The Parties participated in a settlement conference on February 4 and  
2 5, 2016.

3           8. On February 5, 2016, the Parties reached a settlement. As a result, United  
4 States Magistrate Judge Rodgers entered the Parties' confirmation of reaching an  
5 agreement on the record.

6           The Parties have conferred and created a plan related to a joint motion for  
7 approval of settlement agreement and stay of proceedings.

8           *Preliminary Approval of Settlement Agreement and Class Certification.* The  
9 Parties will file a motion for preliminary approval of the Settlement Agreement on  
10 or before February 29, 2016. Both Parties have signed a Settlement Agreement.  
11 However, the Parties would like to file a joint motion for class certification with  
12 the motion for preliminary approval of the Settlement Agreement and need  
13 additional time to prepare their motion.

14           *Suspension of Defendants' Expert Reports.* As a result of settlement,  
15 Defendants do not anticipate the need to file the remaining defense expert reports  
16 due on February 29, 2016. The Parties agree that the Defendants' filing of  
17 remaining expert reports should be suspended.

18           For all the reasons aforementioned, the Parties respectfully request that this  
19 Court grant their motion to stay proceedings in this matter.

1 Respectfully submitted this 12th day of February, 2016.

2 ATTORNEYS FOR PLAINTIFFS  
3 COLUMBIA LEGAL SERVICES

4 /s/ RHONA TAYLOR

5 Rhona Taylor, WSBA #48408  
6 Nicholas B. Straley, WSBA #25963  
7 Melissa R. Lee, WSBA #38808  
8 Attorneys for Plaintiffs  
9 Rhona.Taylor@Columbialegal.org  
10 Columbia Legal Services  
11 Institutions Project  
12 101 Yesler Way, Suite 300  
13 Seattle, WA 98104  
14 (206) 464-0838 – phone  
15 (206) 382-3386 – fax

16 DISABILITY RIGHTS WASHINGTON

17 /s/ DAVID R. CARLSON

18 David R. Carlson, WSBA #35767  
19 Anna C. Guy, WSBA #48154  
20 davidc@dr-wa.org  
Disability Rights Washington  
315 Fifth Avenue South, Suite 850  
Seattle, WA 98104  
(206) 324-1521 – phone  
(206) 957-0729 – fax

ATTORNEYS FOR DEFENDANTS  
LAW, LYMAN, DANIEL, KAMERRER &  
BOGDANOVICH, P.S.

/s/ W. DALE KAMERRER

W. Dale Kamerrer, WSBA 8218  
John E. Justice, WSBA 23042  
dkamerrer@lldkb.com

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Law, Lyman, Daniel, Kamerrer &  
Bogdanovich, P.S.  
P.O. Box 11880  
Olympia, WA 98508-1880  
(360) 754-3480  
(360 357-3511 fax

**Certificate of Service**

I hereby certify that on February 12, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

W. Dale Kamerrer  
dkamerrer@lldkb.com

John E. Justice  
jjjustice@lldkb.com

Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S.  
P.O. Box 11880  
Olympia, WA 98508-1880  
(360) 754-3480  
(360) 357-3511 fax  
Attorneys for Defendants

/s/ RHONA TAYLOR  
RHONA TAYLOR, WSBA #48408  
Of Attorneys for Plaintiffs

Columbia Legal Services  
Institutions Project  
101 Yesler Way, Suite 300  
Seattle, WA 98104  
(206) 464-0838 – phone  
(206) 464-0856 – fax  
rhona.taylor@columbialegal.org