

Michael Fuller, OSB No. 09357

OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com
Direct 503-222-2000

Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

NATHAN MONSON

Case No. 6:22-cv-00604-AA

Plaintiff

JOINT MOTION TO STAY

vs

STATE OF OREGON *et al.*

Defendant

JOINT MOTION TO STAY

Under the Court's inherent authority, the parties respectfully request an order staying discovery in the case and case deadlines for 90 days while the parties attend mediation in hopes of reaching a settlement.

A stay will permit the parties to take the final remaining deposition in this case (currently scheduled for April 21, 2023) off calendar, and to focus their efforts on preparing for the mediation.

This is the third (and expected to be the final) extension request in this case. Good cause exists to grant this motion, as the parties have made good use of prior time, exchanged hundreds of documents in discovery and taken numerous depositions, and worked in good faith to reach stipulations to limit the legal and factual issues necessary for resolution in this action, in the event the case cannot settle.

April 20, 2023

RESPECTFULLY FILED,

s/ Michael Fuller
Michael Fuller, OSB No. 09357
Of Attorneys for Plaintiff
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com
Direct 503-222-2000

CERTIFICATE OF SERVICE

I certify that this document was served on:

Defendant State of Oregon
c/o attorney Marc Abrams
marc.abrams@doj.state.or.us
c/o attorney Jessica Spooner
jessica.spooner@doj.state.or.us

April 20, 2023

s/ Michael Fuller
Michael Fuller, OSB No. 09357
Of Attorneys for Plaintiff
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com
Direct 503-222-2000