

Honorable Robert J. Bryan

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.
PARKER,

Plaintiff(s),

v.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA" or
"SCA, Inc.", et.al,

Defendant(s).

NO. 3:23-cv-05069-RJB

JOINT STATUS REPORT AND
DISCOVERY PLAN

Plaintiffs George DC Parker II and Lori A. Parker (hereinafter "Plaintiffs") and Defendant The Society for Creating Anachronism, Inc., a/k/a SCA, Inc. (collectively hereinafter "Defendant") hereby submit this Joint Status Report and Discovery Plan in accordance with the Court's Minute Order Setting Initial Case Management Dates (Dkt. # 12), Federal Rule of Civil Procedure 26(f), and Local Civil Rule 26(f).

1. Statement of the Nature and Complexity of Case

The parties agree that this is a non-complex dispute. This is a dual-plaintiff, single-defendant case in which Plaintiffs allege that Defendant violated its internal governing documents,

1 created a hostile environment, discriminated against Plaintiff George Parker based on his alleged
2 disability, as well as retaliated against them in violation of state laws.

3 Defendant denies all claims.

4 2. Proposed Deadline for Joining Additional Parties

5 July 30, 2023.

6 3. Consent to Assignment of Magistrate Judge to Conduct All Proceedings

7 The parties do not consent.

8 4. Discovery Plan

9 (A) Initial disclosures:

10 The discovery planning conference under Fed. R. Civ. P. 26(f) was held on June 13, 2023.

11 The parties have exchanged or will exchange initial disclosures under Fed. R. Civ. P. 26(a)(1) by
12 July 10, 2023.

13 (B) Subjects, timing and potential phasing of discovery:

14 The parties do not propose any changes to the subjects or timing of discovery. The parties
15 will adhere to the proportionality standard set forth in Fed. R. Civ. P. 26(b)(1) with reasonably
16 targeted, clear, and as specific as possible discovery requests. The parties further agree that
17 phased discovery is unnecessary.

18 (C) Electronically stored information:

19 The parties do not anticipate any unique issues regarding electronically stored information,
20 but if such issues arise, the parties have agreed to use the Model ESI Agreement to facilitate the
21 production of electronically stored information.

22 (D) Privilege issues:

23 The parties anticipate that there may be privilege issues regarding trial preparation
24 materials, employment, and healthcare records. The parties have agreed to work cooperatively
25

1 to address those concerns and they believe the current rules and motion practice should
2 adequately protect privilege and confidentiality issues.

3 (E) Proposed limitations on discovery:

4 The parties do not propose any limitations beyond those set forth by the Federal Rules of
5 Civil Procedure and Local Civil Rules of this Court. If issues arise, the parties will attempt to
6 resolve them cooperatively, and if necessary, will file the appropriate motions after meeting and
7 conferring.

8 (F) Need for any discovery related orders:

9 At this time, the parties do not anticipate the need for any discovery related orders.

10 5. Parties' Views, Proposals and Agreements

11 (A) Prompt case resolution:

12 No additional recommendations beyond informal settlement communications between
13 counsel. The parties will mediate before trial.

14 (B) Alternative dispute resolution:

15 The parties agree to alternative dispute resolution and agree that mediation is the
16 preferred method of alternative dispute resolution. The parties will engage in mediation before
17 trial.

18 (C) Related cases:

19 None.

20 (D) Discovery management:

21 The parties do not anticipate any discovery management issues. The parties will
22 cooperate in the discovery process. The parties each agree to act in good faith to manage
23 discovery to minimize expense to the litigants, including utilizing electronic means whenever
24 possible. The parties will accept the production of documents via electric means.
25

1 (E) Anticipated discovery sought:

2 The parties anticipate seeking discovery on the issues of liability, causation, damages,
3 and affirmative defenses. The parties intend to depose all parties in this matter as well as relevant
4 witnesses. The parties will issue interrogatories, requests for production or inspection of
5 documents, and requests for admissions. The parties may issue subpoenas. Defendant may
6 seek an independent medical and/or psychological examination of Plaintiff and access to
7 Plaintiff's prior medical and counseling records if those issues are asserted by Plaintiffs. The
8 discovery procedures will be consistent with the Federal Civil Rules.

9 (F) Phasing motions:

10 The parties currently do not believe that phased motions are necessary.

11 (G) Preservation of discoverable information:

12 The parties agree to preserve and not destroy information within the scope of Fed. R. Civ.
13 P. 26(b).

14 (H) Privilege issues:

15 The parties anticipate that there may be issues regarding the privilege of trial preparation
16 materials and the confidentiality of protected health information (PHI), and financial information.
17 The current rules and motion practice should adequately protect privilege and address
18 confidentiality issues.

19 Any inadvertent disclosure of privileged material will be returned to the producing party
20 and will be prohibited from use in any legal argument or submission as if the document had never
21 been produced. Such inadvertently disclosed materials will be promptly returned to the producing
22 party upon discovery by the receiving party.

23 (I) Model Protocol for Discovery of ESI:

24 The parties agree to use the Model Protocol for Discovery of ESI.
25

(J) Alternatives to Model Protocol:

None.

6. Date by Which Discovery Can Be Completed

The parties believe that discovery can be completed by January 31, 2024.

7. Whether the Case Should Be Bifurcated

The parties agree that bifurcation is not warranted in this case.

8. Pretrial Statements and Pretrial Order

The parties agree that the Local Civil Rules related to pre-trial statement should be followed; the parties ask that the court include such timeframes within the scheduling order.

9. Other Suggestions for Shortening or Simplifying the Case

None at this time.

10. Date Case Will Be Ready for Trial

The parties believe that the case will be ready for trial on or after May 20, 2024.

11. Whether the Trial Will Be Jury or Non-Jury

Plaintiff and Defendants requested a jury trial.

12. Number of Days Required for Trial

At present, the parties believe that trial will last 5 days; however, this may change depending on the information obtained through discovery.

13. Trial Counsel Contact Information

Plaintiffs Pro Se:
George DC Parker II
Lori A. Parker
10710 199th Street East
Graham, WA 98338
Tel.: 253-302-0014
E-mail: thenorsegypsyforge@gmail.com

1 Counsel for Defendant SCA, Inc:

2 Justin E. Bolster, Esq.
3 Debra Dickerson, Esq.
4 Preg O'Donnell & Gillett, PLLC
5 901 5th Avenue, Suite 3400
6 Seattle, WA 98164
7 Tel.: (206) 287-1775
8 E-mail: jbolster@pregodonnell.com
9 E-mail: ddickerson@pregodonnell.com

10 14. Setting Trial Date

11 The parties prefer to schedule trial on or after May 20, 2024.

12 Plaintiffs are currently unavailable only on May 15-17, 2024.

13 Defense counsel is currently unavailable on the following days: December 12, 2023 –
14 January 4, 2024; January 15 to 30, 2024; February 5 to 20, 2024; March 4 – 13, 2024; and April
15 11 – 25, 2024.

16 15. Service of Parties

17 All parties have been served in this matter.

18 16. Scheduling Conference

19 Neither party desires a scheduling conference at this time.

20 17. Filing Dates of Corporate Disclosure Statement

21 Defendant has filed its corporate disclosure statement.

22 DATED this 14th day of June, 2023.

23 PREG O'DONNELL & GILLETT PLLC

24 By /s/ Justin E. Bolster

25 Justin E. Bolster, WSBA #38198

Debra Dickerson, WSBA #20397

Attorneys for Defendant The Society for Creative
Anachronism, Inc., a/k/a/ SCA, Inc.

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George DC Parker II, Plaintiff *Pro Se*



Lori A Parker, Plaintiff *Pro Se*

DECLARATION OF SERVICE

1 I hereby declare that on this day I electronically filed the foregoing document with the Clerk
2 of the Court using the CM/ECF system, which will send notification of such filing to the parties of
3 record listed below:

4 **George DC Parker II and Lori A. Parker**

5 **Plaintiffs Pro Se:**

6 George DC Parker II
7 Lori A. Parker
8 10710 199th Street East
9 Graham, WA 98338

- 8 **Via Messenger**
9 **Via Facsimile –**
10 **Via U.S. Mail, postage prepaid**
11 **Via Overnight Mail, postage prepaid**
12 **Via Court E-Service or email with**
13 **recipient’s approval**
14 ***thenorsegypsyforge@gmail.com***

15 DATED at Seattle, Washington, this 14th day of June, 2023.

16 /s/ Ana I. Todakonzie
17 Ana I. Todakonzie, Legal Assistant