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The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

NORTHWEST SCHOOL OF SAFETY, a Washington sole proprietorship, PUGET SOUND SECURITY, INC. , a Washington corporation, PACIFIC NORTHWEST ASSOCIATION OF INVESTIGATORS, INC. , a Washington corporation, FIREARMS ACADEMY OF SEATTLE, INC. , a Washington corporation, DARRYL LEE, XEE DEL REAL, JOE WALDRON, GENE HOFFMAN, ANDREW GOTTLIEB, ALAN GOTTLIEB, GOTTLIEB FAMILY REVOCABLE LIVING TRUST, A Washington trust, and SECOND AMENDMENT FOUNDATION, a non-profit organization,

Plaintiffs,

v.

BOB FERGUSON, Attorney General of Washington (in his official capacity), WASHINGTON ATTORNEY GENERAL'S OFFICE, and JOHN R. BATISTE, Chief of the Washington State Patrol (in his official capacity), and DOES I-V,

Defendants,

and

CHERYL STUMBO, WASHINGTON ALLIANCE FOR GUN RESPONSIBILITY AND EVERYTOWN FOR GUN SAFETY ACTION FUND FOR I-594,

Intervenor-Defendants

NO. 3:14-cv-6026 BHS

STIPULATED MOTION FOR ENTRY OF AGREEMENT REGARDING DISCOVERY OF ELECTRONICALLY STORED INFORMATION

**Note on Motion Calendar:
April 29, 2015**

1 All parties to this action have entered into the attached stipulation for an order
2 regarding the discovery of electronically stored information (“ESI”) and disclosure of
3 privileged information in this matter. Defendants accordingly move this Court for entry of
4 the attached stipulated order.

5 DATED this 29th day of April 2015.

6 ROBERT W. FERGUSON
7 *Attorney General*

8 s/Jeffrey T. Even
9 NOAH G. PURCELL, WSBA # 43492
10 *Solicitor General*
11 JEFFREY T. EVEN, WSBA # 20367
12 REBECCA R. GLASGOW, WSBA # 32886
13 *Deputy Solicitors General*
14 R. JULY SIMPSON, WSBA # 45869
15 *Assistant Attorney General*

16 Attorneys For Defendants Bob Ferguson,
17 Attorney General Of Washington, Washington
18 Attorney General's Office, and John R. Batiste,
19 Chief Of The Washington State Patrol
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1 **Certificate of Service**

2 I certify, under penalty of perjury under the laws of the state of Washington, that I
3 electronically filed a true and correct copy of the foregoing document with the United States
4 District Court ECF system, which will send notification of the filing to the following:
5

6 David B. Edwards 7 Steven W. Fogg 8 Corr Cronin Michelson Baumgardner & Preece 9 1001 4th Avenue, Suite 3900 10 Seattle, WA 98154-1051 11 Phone: 206.625.8600 12 dedwards@correronin.com 13 sfogg@correronin.com	14 Mikolaj T. Tempski 15 Tempski Law Firm PS 16 40 Lake Bellevue, Suite 100 17 Bellevue, WA 98005 18 Phone: 425.998.6203 19 Email: Miko@TempskiLaw.com
20 Gregory J. Wong 21 Paul J. Lawrence 22 Sarah S. Washburn 23 Pacifica Law Group, LLP 24 1191 Second Avenue, Suite 2000 25 Seattle Washington 98101-3404 26 paul.lawrence@pacificallawgroup.com greg.wong@pacificallawgroup.com sarah.washburn@pacificallawgroup.com	

DATED this 29th day of April 2015, at Olympia, Washington.

s/ Stephanie N. Lindey
STEPHANIE N. LINDEY
Legal Secretary