

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

**Sheila Marino, an individual, on behalf of herself and all others
similarly situated v. Farmers New World Life Insurance Company;
and Does 1 through 10, inclusive**

Marino · No. 2:25-cv-02200-JNW · Decided January 12, 2026

SUMMARY

This document is a stipulated motion by Sheila Marino and Farmers New World Life Insurance Company to stay discovery and initial case deadlines pending resolution of the defendant’s motion to dismiss. The United States District Court for the Western District of Washington granted the motion and ordered discovery and the initial scheduling deadlines stayed on January 12, 2026.

OPINION

1 THE HONORABLE JAMAL N. WHITEHEAD 2 3 4 5 6 7 UNITED STATES DISTRICT
COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 SHEILA MARINO,
an individual, on behalf of Case No. 2:25-cv-02200-JNW herself and all others similarly situated,
11 STIPULATED MOTION TO STAY Plaintiff, DISCOVERY AND ORDER 12 v. NOTE ON
MOTION CALENDAR: 13 DECEMBER 23, 2025 FARMERS NEW WORLD LIFE 14
INSURANCE COMPANY; and DOES 1 through 10, inclusive, 15 Defendants.

16 17 STIPULATED MOTION 18 Pursuant to Local Civil Rules 7(d)(1) and 10(g), Defendant
Farmers New World Life 19 Insurance Company (“FNWL”) and Plaintiff Sheila Marino,
(collectively, the “Parties”), by and 20 through their respective counsel, respectfully submit this
joint stipulated motion to stay discovery 21 and the deadlines contained within the Court’s Order
Regarding Initial Disclosures and Joint Status 22 Report (“Scheduling Order”) (Dkt.

11) pending the Court’s resolution of FNWL’s Motion to 23 Dismiss (Dkt. 10). In support of this
Stipulated Motion, the Parties state as follows: 24 1. On October 1, 2025, Plaintiff filed this
putative class action against FNWL in King County 25 Superior Court, entitled Sheila Marino, an
individual, on behalf of herself and all others 26 STIPULATED MOTION TO STAY
DISCOVERY 1 similarly situated, v. Farmers New World Life Insurance Company, Case No. 25-
2-28917- 2 6-SEA.

3 2. FNWL filed a Notice of Removal on November 5, 2025 (Dkt. 1). 4 3. FNWL filed a Motion
to Dismiss on November 20, 2025 (Dkt. 10). 5 4. On December 5, the Court issued its Initial
Scheduling Order (Dkt. 11). The Initial 6 Scheduling Order set the following deadlines: 7 a.

December 26, 2025: Deadline for Parties to hold an FRCP 26(f) Conference; 8 b. January 9, 2026: Deadline for Parties to exchange Initial Disclosures pursuant to 9 FRCP 26(a)(1); and 10 c. January 16, 2026: Deadline for Parties to submit their Joint Status Report and 11 Discovery Plan to the Court per FRCP 26(f) and Local Civil Rule 26(f).

12 5. The Parties have conferred and agree that a stay of discovery and deadlines set forth in the 13 Initial Scheduling Order pending the Court's resolution of FNWL's Motion to Dismiss is 14 in the best interest of the Parties, counsel, and the Court; that a stay would promote the 15 interests of judicial economy; and that a stay would help preserve judicial and party 16 resources.

See *Landis v. North Am. Water Works and Elec. Co.*, 299 U.S. 248, 254 (1936) 17 (“[T]he power to stay proceedings is incidental to the power inherent in every court to 18 control the disposition of the causes on its docket with economy of time and effort for itself, 19 for counsel, and for litigants.”). 20 6.

The Parties accordingly request that the Court stay all case deadlines and discovery pending 21 a decision by the Court on FNWL's Motion to Dismiss. 22 7. This Stipulated Motion is filed in good faith and is supported by good cause. 23 CONCLUSION 24 For the foregoing reasons, the Parties respectfully request that this Stipulated Motion be 25 granted and that the Court stay discovery and the initial deadlines contained within the Initial 26 Scheduling Order pending the outcome of the Court's Order on Defendant's Motion to Dismiss.

STIPULATED MOTION TO STAY DISCOVERY 1 IT IS SO STIPULATED THIS 23rd day of December, 2025. 2 I certify that this memorandum contains 422 words, in compliance with the Local Civil Rules. 3 4 HAFFNER LAW PC STOEL RIVES LLP 5 s/ Trevor Weinberg s/ Jenna M. Poligo 6 JOSHUA H. HAFFNER, WSBA #53292 TIMOTHY W. SNIDER, WSBA No. 39808 jhh@haffnerlawyers.com timothy.snider@stoel.com 7 ALFREDO TORRIJOS (admitted pro hac vice) JENNA M. POLIGO, WSBA No. 54466 at@haffnerlawyers.com jenna.poligo@stoel.com 8 TREVOR WEINBERG (admitted pro hac vice) SARA J. WADSWORTH, WSBA No. 55952 tw@haffnerlawyers.com sara.wadsworth@stoel.com 9 10 15260 Ventura Blvd., Suite 1520 600 University Street, Suite 3600 Sherman Oaks, CA 91403 Seattle, WA 98101 11 Telephone: (213) 514-5681 Tel: 206.624.0900 Facsimile: (213) 514-5682 12 Attorneys for Defendant Farmers New World Counsel Plaintiff Sheila Marino Life Insurance Company 13 14 15 16 17 18 19 20 21 22 23 24 25 26 STIPULATED MOTION TO STAY DISCOVERY 1 ORDER 2 Pursuant to LCR 10(g), and based on the foregoing stipulated motion of the parties, for 3 || good cause and due to the circumstances set forth above in the stipulated motion; IT IS SO 4 || ORDERED that discovery and the initial deadlines contained within the Initial Scheduling Order 5 || be stayed pending the outcome of the Court's Order on Defendant's Motion to Dismiss.

6 7 ||DATED: January 12, 2026 BY THE COURT:? on. Jamal N. Whitehead 10 1] 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 STIPULATED MOTION TO STAY DISCOVERY AND ORDER -

4 (Case No. 2:25-CV-02200-JNW) STOEL RIVES up

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