

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

OPINION

Marino

PER CURIAM.

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

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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