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[Attorneys for additional parties in signature block]

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

COLLEEN STROEDER,

Case No. 3:19-cv-01181-HZ

Plaintiff,

v.

**JOINT STIPULATION AND  
[PROPOSED] ORDER RE: STAY OF  
CASE**

SERVICE EMPLOYEES  
INTERNATIONAL UNION LOCAL 503,  
OREGON PUBLIC EMPLOYEES UNION;  
KATE BROWN, in her official capacity as  
governor of OREGON; PAUL MATHER, in  
his official capacity as acting director of the  
Oregon Department of Transportation; and  
KATY COBA, in her official capacity as  
director of the Oregon Department of  
Administrative Services,

Defendants.

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WHEREAS, on October 31, 2019, pursuant to the parties' stipulation, the Court extended all discovery and pre-trial order deadlines in this case until after the Rule 16 conference, which the Court stated it would set following resolution of the then-pending Motion to Dismiss by Defendants Governor Kate Brown, Paul Mather, and Katy Coba ("State Defendants"), Dkt. 28;

WHEREAS, on December 10, 2019, the Court granted the State Defendants' Motion to Dismiss Plaintiff's claims against the State Defendants as moot, Dkt. 30;

WHEREAS, the remaining defendant, Service Employees International Union Local 503, Oregon Public Employees Union ("SEIU Local 503, OPEU"), contends that Plaintiff's claim for prospective relief against SEIU Local 503, OPEU is moot for the same reasons as the Court found with respect to Plaintiff's claims against the State Defendants;

WHEREAS, Plaintiff's claim for damages against SEIU Local 503, OPEU is likely to be controlled by the Ninth Circuit's decision in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137, which was argued to the Ninth Circuit on December 10, 2019, and is currently under submission before that Court;

WHEREAS, on December 11, 2019, the Court's courtroom deputy emailed the parties in this case to request dates in early January 2020 that the parties would be available for a Rule 16 telephone conference in this matter;

WHEREAS, to conserve party and judicial resources and most efficiently resolve this case, the parties agree that further proceedings in this case should be stayed until the Ninth Circuit issues a decision in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137, so the parties and the Court will have the benefit of that decision in seeking to resolve the remaining issues in this case;

THEREFORE, the parties, through their respective counsel, stipulate and request that the Court order that all further proceedings in this case be stayed until the Ninth Circuit issues a

decision in *Belgau v. Inslee*, Ninth Cir. Case No. 19-35137, at which point the parties will promptly inform the Court of the issuance of that decision and request to schedule a Rule 16 Conference.

So stipulated,

Dated: December 17, 2019

By: /s/ Matthew J. Murray  
Matthew J. Murray

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MATTHEW J. MURRAY  
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JAMES S. COON  
Thomas, Coon, Newton & Frost

*Attorneys for Defendant SEIU Local 503, OPEU*

Dated: December 17, 2019

By: /s/ Carla A. Scott  
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*Attorneys for Defendants Governor Kate Brown, Paul Mather and Katy Coba*

Dated: December 17, 2019

By: /s/ Brian K. Kelsey  
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*Attorneys for Plaintiff*

**[PROPOSED] ORDER**

**It is so ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon. Marco A. Hernandez  
United States District Judge