

The Honorable Nicole Gaines Phelps  
Note for Hearing Date: October 21, 2024  
Without Oral Argument

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**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON**  
**IN AND FOR THE COUNTY OF KING**

**Case No. 23-2-11268-7**

**KARLA ORTIZ**, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

**EXPEDIA, INC.**, a Delaware Corporation,

Defendant.

**STIPULATED MOTION TO CONTINUE  
FINAL APPROVAL HEARING DATE;  
PROPOSED ORDER**

1 Plaintiff Karla Ortiz and Defendant Expedia, Inc. stipulate and request as follows:

2 1. On July 9, 2024, the Court granted preliminary approval of Class Action  
3 Settlement, approved the proposed Notice of Settlement, and set a Final Approval hearing for  
4 October 29, 2024. In its Preliminary Approval Order, the Court “reserve[d] the right to adjourn  
5 or continue the date of the final fairness hearing without further notice to Class Members.”

6 2. The deadline for Class Members to opt out, or object to the Settlement, was  
7 September 30, 2024.

8 3. On September 27, 2024, the named Plaintiff submitted a request for exclusion. An  
9 additional 9 Class Members out of a total of 2,225 Class Members also submitted requests for  
10 exclusion. No Class Member submitted an objection to the Settlement.

11 4. Although the named Plaintiff signed the Settlement Agreement and the entire  
12 notice process has been completed as required by that agreement, in light of the named Plaintiff’s  
13 request to be excluded from the Settlement, the parties believe that it is in the best interests of all  
14 involved to identify (and substitute for the named Plaintiff) another class representative who can  
15 be designated by the Court to represent the interests of the Class.

16 5. In order to provide Plaintiff’s Counsel ample time to focus on locating a new Class  
17 Representative, and to provide the parties ample time to meet and confer on matters necessary to  
18 seek final approval of the Settlement, including amending the Settlement Agreement as needed,  
19 administering further notice to the Class, and preparing stipulations and/or motions to submit to  
20 the Court as needed, the parties stipulate and agree that Final Approval Hearing should be  
21 continued by approximately seventy (70) days, until January 7, 2025, or as soon thereafter as the  
22 Court is available.

23 IT IS SO STIPULATED.

24 Dated: October 16, 2024

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<p style="text-align: center;"><u>/s/ Monica Romero</u></p> <p>Patrick M. Madden, WSBA #21356          Todd L. Nunn, WSBA #23267          Shelby R. Stoner, WSBA #53837          Monica A. Romero, WSBA #58376          K&amp;L GATES LLP          925 Fourth Avenue, Suite 2900          Seattle, Washington 98104-1158          Tel: (206) 623 7580          Fax: (206) 623 7022          Email: patrick.madden@klgates.com          Email: todd.nunn@klgates.com          Email: shelby.stoner@klgates.com          Email: monica.romero@klgates.com          Attorneys for Defendant</p>	<p style="text-align: center;"><u>/s/ Ari Cherniak</u></p> <p>Julian Hammond, WSBA #52096          Ari Cherniak, WSBA #55727          HAMMONDLAW, P.C.          1201 Pacific Ave Suite 600          Tacoma, WA 98402          Telephone: (206) 707-9366          Fax: (310) 295-2385          Email: jhammond@hammonlawpc.com          Email: acherniak@hammondlawpc.com          Attorneys for Plaintiff</p>
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~~PROPOSED~~ ORDER *ORDER*

Based on the foregoing, and finding good cause, the Court hereby continues the October 29, 2024 Final Approval Hearing until January 7, 2025 at 8:45 a.m.

IT IS SO ORDERED.

DATED this 21<sup>st</sup> day of October, 2024

  
 THE HONORABLE NICOLE GAINES PHELPS