



State of Washington v. Landmark Technology A LLC

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Washington Western District Court

Judge:	Ricardo S Martinez
Referred:	Theresa L Fricke
Case #:	2:21-cv-00728
Nature of Suit	950 Other Statutes - Constitutionality of State Statutes
Cause	28:1442 Notice of Removal
Case Filed:	Jun 02, 2021
Case in other court:	King County Superior Court, 21-00002-06348-5-SEA

Docket	Parties (7)	News
Last checked: Thursday Mar 06, 2025 2:36 AM PST		
Update Parties ↻		

Defendant Landmark Technology A LLC	Represented By James P Ware <i>Gleam Law</i> 206-693-2900 james@gleamlaw.com Justin Patrick Walsh <i>Gleam Law PLLC</i> 206-693-2900 justin@gleamlaw.com
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Defendant
Melody Camp

Defendant Raymond Mercado	Represented By James P Ware <i>Gleam Law</i> 206-693-2900 james@gleamlaw.com
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Defendant
Patrick Nunally

Plaintiff

State of Washington

Represented By

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Aaron J. Fickes
Ballard Spahr Llp (sea)
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TERMINATED PARTIES**Counter Claimant**

Landmark Technology A LLC
Terminated: 03/15/2023

Represented By

James P Ware
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206-693-2900
james@gleamlaw.com

Justin Patrick Walsh
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Derek Alan Newman
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Derek Linke
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Counter Defendant

Landmark Technology A LLC
Terminated: 03/15/2023

Represented By

James P Ware
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[+ Navigation](#)[Create Alert](#)

Docket last updated: 12 hours ago

[Update Now](#)**Wednesday, November 12, 2025**

- 207 [notice](#) [Notice of Supplemental Authority](#) [Mon 11/17 3:18 PM](#)
NOTICE of Supplemental Authority re176 MOTION to Stay by Defendant Patrick Nunally. (APH)

Monday, November 10, 2025

- 206 [2 pgs](#) [order](#) [Order on Stipulated Motion ~Util - Set/Reset Deadlines/Hearings](#) [Mon 11/10 1:04 PM](#)
ORDER granting Parties'201 Stipulated Motion Extending Discovery Deadlines for Plaintiff State of Washington and Defendants Landmark Technology A LLC and Raymond Mercado. Discovery Motions due by 5/15/2026, Discovery to be completed by 5/22/2026, Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 6/19/2026. Signed by Judge Theresa L Fricke.(MW)

Friday, November 07, 2025

- 205 [respm](#) [Reply to Response to Motion](#) [Fri 11/07 5:47 PM](#)
REPLY, filed by Counter Claimants Melody Camp, Landmark Technology A LLC, Landmark Technology A LLC, Raymond Mercado, Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado, TO RESPONSE to194 CROSS MOTION AND RESPONSE re180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Walsh, Justin)
- 204 [misc](#) [Letter](#) [Fri 11/07 1:16 PM](#)
LETTER from Bob Hyde re203 Declaration,, the Clerk of Court regarding Redactions in Document 203-1, Exhibit 24 filed by State of Washington(Hyde, Robert)
- Att: 1 Exhibit 24 to
Att: 203 Declaration of Bob Hyde



Friday, October 31, 2025

- 203 [respm](#) [Declaration](#) [Fri 10/31 3:06 PM](#)
DECLARATION of Bob Hyde filed by Plaintiff State of Washington re194 CROSS MOTION AND RESPONSE re180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH ,180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH(Hyde, Robert)
- Att: 1 Exhibit 24,
Att: 2 Exhibit 25,

Att: 3  Exhibit 26,



Att: 4  Exhibit 27,

Att: 5  Exhibit 28

202   respm Reply to Response to Motion Fri 10/31 2:54 PM

REPLY, filed by Plaintiff State of Washington, TO RESPONSE to 194 CROSS MOTION AND RESPONSE re 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH , 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Hyde, Robert)

Wednesday, October 29, 2025

201   motion Stipulated Motion Wed 10/29 11:21 AM

Stipulated MOTION and Proposed Order Extending Discovery Deadlines for Plaintiff State of Washington and Defendants Landmark Technology A LLC and Raymond Mercado , filed by Plaintiff State of Washington. Noting Date 10/29/2025, (Brysacz, Ben)

Friday, October 24, 2025

200 minutes Discovery Hearing Fri 10/24 4:53 PM

MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: G Riekana ; Pla Counsel: Ben Brysacz, Aaron Fickes ; Def Counsel: James Ware, Justin Walsh; and Patrick Nunally (pro se) ; CR: Nancy Bauer ; Time of Hearing: 9:00 am ; Zoom Discovery Hearing held on 10/24/2025. Court hears from parties re ongoing discovery issues. Parties directed to file stipulated motion to amend scheduling order re discovery by 11/3/2025. Defendant Nunally reminded of his obligations as a pro se litigant; defendant to provide updated mailing address to parties and file a notice with the court; defendant also reminded of need to stay in regular communication with parties. (GMR- cc: pltf)

Tuesday, October 21, 2025

199   misc Mail Returned Tue 10/21 3:52 PM



Mail addressed to Patrick Nunally returned as Undeliverable re 189 Notice of Hearing. (JDM)

Tuesday, October 14, 2025



utility Notice of Docket Text Modification Tue 10/14 9:23 AM

NOTICE of Docket Text Modification. Dkts. 192 and 193 were filed in error and are stricken per filer request. The filer names for Dkt. 195 are corrected. (LH)



Friday, October 10, 2025

198   notice Notice-Other Tue 10/14 11:14 AM


NOTICE of Joinder JOINING 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH ; filed by Defendant Patrick Nunally. (TE)

197   respm Declaration Fri 10/10 7:35 PM

DECLARATION of Melody Camp filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado re 194 CROSS MOTION AND RESPONSE re 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Walsh, Justin)



196   respm Declaration Fri 10/10 7:33 PM

DECLARATION of Raymond Mercado filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado re 194 CROSS MOTION AND RESPONSE re 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Walsh, Justin)


Att: 1  Exhibit The Patent Prosecution History for the 319 Patent,


Att: 2  Exhibit Office Action in Ex Parte Reexamination for the 319 Patent and Confirming Claims 1-28,

Att: 3  Exhibit The C1 Confirming Claims 1-28 of the 319 Patent

195   respm Declaration Fri 10/10 7:28 PM


DECLARATION of Justin P. Walsh filed by All Defendants re 194 CROSS MOTION AND RESPONSE re 180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Walsh, Justin)


Att: 1  Exhibit U.S. Gen. Accounting Off., Patent Examination Statistics,


Att: 2  Exhibit USPTO, Request for Ex Parte Reexamination Filed,


Att: 3  Exhibit USPTO, Bibliographic Data Sheet, Control No. 90/012,641,


Att: 4  Exhibit USPTO, Reexamination Third Party Requester Power of Attorney,


Att: 5  Exhibit USPTO, Notice of Intent to Issue Ex Parte Reexamination Certificate,

Att: 6  Exhibit USPTO, Ex Parte Reexamination Certificate, Control No. 90/012,641,


Att: 7  Exhibit Motion to Expunge Declaration, CBM2014-00025,


Att: 8  Exhibit List of LTA cases in the Western District of Washington where LTA was Plaintiff, pulled from PACER,

Att: 9  Exhibit List of LT cases in the Western District of Washington where LT was Plaintiff, pulled from PACER


194 ☆  [motion](#) [Cross Motion](#) [Fri 10/10 7:20 PM](#)

CROSS MOTION AND RESPONSE re180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH , filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado. Noting Date 11/7/2025, (Walsh, Justin)

Att: 1  Proposed Order for Ruling Re- Applicable Legal Test

193 ☆  [respm](#) [Declaration](#) [Fri 10/10 7:14 PM](#)


DECLARATION of Melody Camp filed by Defendant Melody Camp re180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH (Walsh, Justin)

192 ☆  [respm](#) [Response to Motion](#) [Fri 10/10 7:08 PM](#)

RESPONSE, by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado, to180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH .(Walsh, Justin)


Att: 1  Proposed Order

Monday, October 06, 2025

191 ☆  [respm](#) [Reply to Response to Motion](#) [Wed 10/08 12:26 PM](#)

REPLY, filed by Defendant Patrick Nunally, TO RESPONSE to175 MOTION for Judgment on the Pleadings. (TE)

Friday, October 03, 2025


190 ☆  [2 pgs](#) [order](#) [Order on Stipulated Motion ~Util - Set/Reset Deadlines/Hearings](#) [Fri 10/03 2:50 PM](#)

ORDER granting188 Stipulated Motion Setting Briefing Schedule for Renewed Motions Regarding the Applicable Legal Test for Determining Bad Faith. Signed by Judge Ricardo S. Martinez. (TE)

189 [notice](#) [Notice of Hearing](#) [Fri 10/03 12:41 PM](#)

NOTICE of Hearing: Status Conference set for 10/24/2025 at 9:00 AM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. (GMR- cc: dft Nunally via USPS)



Wednesday, October 01, 2025

188 ☆  [motion](#) [Stipulated Motion](#) [Wed 10/01 11:47 AM](#)


Stipulated MOTION Setting Briefing Schedule for Renewed Motions Regarding the Applicable Legal Test for Determining Bad Faith , filed by Plaintiff State of Washington. Noting Date 10/1/2025, (Hyde, Robert)

Att: 1  Proposed Order

Monday, September 29, 2025

187 ☆   [60 pgs](#) [respm](#) [Reply to Response to Motion](#) [Tue 09/30 12:03 PM](#)


REPLY, filed by Defendant Patrick Nunally, TO RESPONSE to176 MOTION to Stay. (TE)

186 ☆  [respm](#) [Declaration](#) [Mon 09/29 4:22 PM](#)

DECLARATION of James Ware filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado re176 MOTION to Stay (Ware, James)

185 ☆  [respm](#) [Reply to Response to Motion](#) [Mon 09/29 4:20 PM](#)


REPLY, filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado, TO RESPONSE to176 MOTION to Stay (Ware, James)

184 ☆  [respm](#) [Response to Motion](#) [Mon 09/29 2:22 PM](#)

RESPONSE, by Plaintiff State of Washington, to175 MOTION for Judgment on the Pleadings.(Brysacz, Ben)

Att: 1  Proposed Order



Tuesday, September 23, 2025

183 ☆  [respm](#) [Response to Motion](#) [Tue 09/23 1:09 PM](#)

RESPONSE, by Plaintiff State of Washington, to176 MOTION to Stay.(Hyde, Robert)



Att: 1  Proposed Order

Monday, September 22, 2025
























182   misc Status Report Mon 09/22 1:47 PM



Joint STATUS REPORT by Plaintiff State of Washington (Brysacz, Ben)

Friday, September 19, 2025

181   8 pgs respm Declaration Fri 09/19 1:26 PM

DECLARATION of Bob Hyde filed by Plaintiff State of Washington re180 MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH(Hyde, Robert)



Att: 1  Exhibit 1,
Att: 2  Exhibit 2,
Att: 3  Exhibit 3,
Att: 4  Exhibit 4,
Att: 5  Exhibit 5,
Att: 6  Exhibit 6,
Att: 7  Exhibit 7,
Att: 8  Exhibit 8,
Att: 9  Exhibit 9,
Att: 10  Exhibit 10,
Att: 11  Exhibit 11,
Att: 12  Exhibit 12,
Att: 13  Exhibit 13,
Att: 14  Exhibit 14,
Att: 15  Exhibit 15,
Att: 16  Exhibit 16,
Att: 17  Exhibit 17,
Att: 18  Exhibit 18,
Att: 19  Exhibit 19,
Att: 20  Exhibit 20,
Att: 21  Exhibit 21,
Att: 22  Exhibit 22,
Att: 23  Exhibit 23

180   motion Miscellaneous Relief Fri 09/19 1:18 PM

MOTION RULING RE: APPLICABLE LEGAL TEST FOR DETERMINING BAD FAITH , filed by Plaintiff State of Washington. Noting Date 11/7/2025, (Hyde, Robert)



Att: 1  Proposed Order

Thursday, September 18, 2025

179   notice Notice of Withdrawal of Counsel Thu 09/18 2:59 PM



NOTICE OF WITHDRAWAL OF COUNSEL: Attorney Michael K Davis-Hall for Counter Defendant State of Washington, Plaintiff State of Washington. (Davis-Hall, Michael)

Wednesday, September 10, 2025




178   notice Notice of Joinder into Motion Wed 09/10 9:50 AM

NOTICE of Joinder JOINING176 MOTION to Stay, by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado. (Walsh, Justin)






Monday, September 08, 2025




177   2 pgs respm Declaration Tue 09/09 12:05 PM

DECLARATION filed by Defendant Patrick Nunally re176 MOTION to Stay. (MW)

176    7 pgs motion Stay Tue 09/09 12:04 PM




MOTION to Stay, filed by Defendant Patrick Nunally. Noted by Clerk for 9/29/2025. (MW)

Att: 1  Certificate of Service,
Att: 2  Exhibit A1,
Att: 3  Exhibit A2,
Att: 4  Exhibit A3,
Att: 5  Proposed Order




175    17 pgs motion Judgment on the Pleadings Tue 09/09 12:01 PM

MOTION for Judgment on the Pleadings, filed by Defendant Patrick Nunally. Noted by Clerk for 10/6/2025. (MW)

Att: 1  Proposed Order




174    4 pgs notice Notice-Other Tue 09/09 11:59 AM

NOTICE of Constitutional Challenge; filed by Defendant Patrick Nunally. (MW)




173    3 pgs misc IFP Deficiency Corrected Tue 09/09 11:58 AM

Signature Page re168 Case/IFP Deficiency Letter,166 Answer to Amended Complaint, filed by Defendant Patrick Nunally. (MW)



Friday, September 05, 2025

172    87 pgs answer Answer to Amended Complaint Counterclaim Fri 09/05 2:48 PM



ANSWER to126 Amended Complaint, with JURY DEMAND, COUNTERCLAIM against plaintiff State of Washington by Landmark Technology A LLC, Raymond Mercado, Melody Camp.(Ware, James)

Att: 1  Exhibit A,
Att: 2  Exhibit B,
Att: 3  Exhibit C

Tuesday, September 02, 2025



171   1 pgs order Order on Motion for Order ~Util - Add and Terminate Attorneys Tue 09/02 1:01 PM

ORDER granting169 Motion for Withdrawal and Substitution. Attorney Justin Patrick Walsh and James P Ware for Melody Camp are permitted to substituted as counsel for Defendant Melody Camp, effective immediately. Attorney Lorianne Hanson and Emelia Hickok terminated, per Order. Signed by Judge Ricardo S. Martinez. (TE)

170   1 pgs order Order on Motion for Extension of Time to Answer ~Util - Set/Reset Deadlines/Hearings Tue 09/02 12:49 PM



ORDER granting165 Motion for Extension of Time to Answer. The deadline for Defendant Melody Camp to file her Answer is extended to 9/5/2025. Signed by Judge Ricardo S. Martinez.(TE)

Tuesday, August 26, 2025



169   5 pgs motion Order Tue 08/26 12:04 PM

Unopposed MOTION for Order Withdrawal and Substitution , filed by Defendant Melody Camp. Noting Date 8/26/2025, (Ware, James)

Monday, August 25, 2025



168   utility Case/IFP Deficiency Letter Mon 08/25 4:11 PM

Notice of Filing Deficiency re166 Answer to Amended Complaint. ***Action Required*** Improper/Missing Signature. See attached letter for more information and instructions. Corrected signature page must be filed by 9/8/2025. (TE)(Defendant via USPS)


167   order 2 - Minute Order ~Util - Set/Reset Deadlines Mon 08/25 10:39 AM

MINUTE ORDER entered at the direction of Judge Theresa L Fricke. The Court has reviewed the parties' status report filed on August 15, 2025. Dkt.163 . The parties are ORDERED to submit a joint status report to the Court on September 22, 2025, and provide the Court with an update on each discovery project the parties are working on, and whether the parties require the Court's guidance on any discovery issues. After reviewing the parties' submission, the Court will determine whether a discovery conference is necessary. (GMR)

Thursday, August 21, 2025


166   answer Answer to Amended Complaint Fri 08/22 12:14 PM

ANSWER to126 Second Amended Complaint, with JURY DEMAND by Patrick Nunally. (TE)

165 ☆  **motion** **Extension of Time to File Answer** **Thu 08/21 12:00 PM**

Stipulated MOTION for Extension of Time to File Answer for Defendant Melody Camp , filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado, Patrick Nunally, Counter Claimant Landmark Technology A LLC. Noting Date 8/21/2025, (Walsh, Justin)

Att: 1  Proposed Order Stipulated

164 ☆  **motion** **Extension of Time to File Answer** **Thu 08/21 11:13 AM**


DISREGARD, filed in error Stipulated MOTION for Extension of Time to File Answer for Defendant Melody Camp , filed by Defendants Melody Camp, Landmark Technology A LLC, Raymond Mercado, Patrick Nunally, Counter Claimant Landmark Technology A LLC. Noting Date 8/22/2025, (Walsh, Justin) Modified on 8/21/2025 to strike entry at request of filer. Will re-file correct motion. (CDA)

Att: 1  Proposed Order Stipulated

utility **Notice of Docket Text Modification Terminate Motions (Public)** **Thu 08/21 11:43 AM**


NOTICE of Docket Text Modification re164 Stipulated MOTION for Extension of Time to File Answer for Defendant Melody Camp : Entry stricken at request of filer, corrected motion will be filed. (CDA)

Friday, August 15, 2025

163 ☆  **misc** **Status Report** **Fri 08/15 10:08 AM**

Joint STATUS REPORT by Plaintiff State of Washington (Brysacz, Ben)

Wednesday, August 06, 2025

162 ☆  **8 pgs** **order** **Order on Motion to Dismiss ~Util - Terminate Motions** **Wed 08/06 4:12 PM**


ORDER denying137 Motion to Dismiss for Lack of Personal Jurisdiction and145 Defendant Nunally's Motion to Quash Service and Dismiss for Lack of Personal Jurisdiction. Signed by Judge Ricardo S. Martinez. (TE)

Tuesday, July 29, 2025

161 **order** **2 - Minute Order ~Util - Set/Reset Deadlines** **Tue 07/29 4:57 PM**


MINUTE ORDER entered at the direction of Judge Theresa L Fricke. The Court has reviewed the parties' status report filed on July 9, 2025. Dkt.160 . The parties are ORDERED to submit a joint status report to the Court on August 15, 2025, and provide the Court with an update on each discovery project the parties are working on, and whether the parties require the Court's guidance on any discovery issues. After reviewing the parties' submission, the Court will determine whether a discovery conference is necessary. (GMR)

Wednesday, July 09, 2025

160 ☆  **6 pgs** **misc** **Status Report** **Wed 07/09 1:03 PM**


STATUS REPORT by Plaintiff State of Washington (Brysacz, Ben)

Thursday, June 12, 2025

159 ☆  **6 pgs** **order** **1 - Order ~Util - Set/Reset Deadlines/Hearings** **Thu 06/12 10:13 AM**

AMENDED DISCOVERY SCHEDULING ORDER; ORDER ON PARTIES' CONTESTED DISCOVERY ISSUES. Discovery Motions due by 11/14/2025, Discovery to be completed by 11/21/2025, Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 12/19/2025, Joint Status Report due by 7/9/2025. Signed by Judge Theresa L Fricke. (MW)

Monday, June 09, 2025

158 ☆  **misc** **Supplement** **Mon 06/09 10:58 AM**

SUPPLEMENT re148 Status Report by Plaintiff State of Washington(Brysacz, Ben)

Att: 1  Supplement Appendix A to Status Report

Friday, June 06, 2025



157 **minutes** **Discovery Hearing** **Fri 06/06 1:00 PM**

MINUTE ENTRY for Zoom Discovery Hearing held before Judge Theresa L Fricke on 6/6/2025- Dep Clerk: Gayle Riekema ; Pla Counsel: Ben Brysacz, Robert Hyde ; Def Counsel: James Ware, Justin Walsh ; CR: Angela Nicolavo ; Time of Hearing: 11:30am ; Court hears from parties re discovery issues raised in Status Report (dkt148). Order to issue. (GMR)


Friday, May 16, 2025

156 ☆  **13 pgs** **respm** **Response to Motion** **Wed 05/21 1:18 PM**

REPLY IN SUPPORT OF145 MOTION to Quash Service and Dismiss,by Defendant Patrick Nunally,(PS)



Att: 1   3 pgs Supplemental Declaration of Patrick Nunally in Support of Motion to Quash

Tuesday, May 13, 2025

155  notice Notice of Hearing Tue 05/13 2:23 PM

NOTICE of Hearing: Discovery Conference set for 6/6/2025 at 11:30 AM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. (GMR)



Friday, May 09, 2025

154   misc Praeipce to Attach Document Fri 05/09 3:38 PM

PRAECIPE to attach document (Corrected Reply) re150 Reply to Response to Motion by Defendant Melody Camp(Hanson, Lorianne)

Att: 1  Corrected Document for Dkt 150

Wednesday, May 07, 2025

153   respm Declaration Wed 05/07 10:31 AM

DECLARATION of Ben Brysacz filed by Plaintiff State of Washington re145 MOTION to Dismiss(Brysacz, Ben)



Att: 1  Exhibit 1-35

152    33 pgs respm Response to Motion Wed 05/07 10:16 AM

RESPONSE, by Plaintiff State of Washington, to145 MOTION to Dismiss.(Brysacz, Ben)

Att: 1  Proposed Order

Monday, May 05, 2025

151   respm Declaration Mon 05/05 1:36 PM

DECLARATION of Melody Camp filed by Defendant Melody Camp re137 MOTION to Dismiss for Lack of Personal Jurisdiction (Hickok, Emelia)



150   respm Reply to Response to Motion Mon 05/05 1:34 PM

REPLY, filed by Defendant Melody Camp, TO RESPONSE to137 MOTION to Dismiss for Lack of Personal Jurisdiction (Hickok, Emelia)

Friday, May 02, 2025




149   misc Report Fri 05/02 3:24 PM

REPORT re: Proposed Case Schedule by Plaintiff State of Washington (Hyde, Robert)

148   misc Status Report Fri 05/02 3:13 PM

STATUS REPORT by Plaintiff State of Washington (Hyde, Robert)

Monday, April 28, 2025

147    6 pgs respm Declaration Mon 04/28 3:46 PM

DECLARATION of Ben Brysacz filed by Plaintiff State of Washington re137 MOTION to Dismiss for Lack of Personal Jurisdiction(Brysacz, Ben)




Att: 1  Exhibit A-MM

146    33 pgs respm Response to Motion Mon 04/28 3:33 PM

RESPONSE, by Plaintiff State of Washington, to137 MOTION to Dismiss for Lack of Personal Jurisdiction . Oral Argument Requested. (Brysacz, Ben)



Att: 1  Proposed Order

Thursday, April 17, 2025


145    16 pgs motion Dismiss Fri 04/18 2:40 PM

MOTION to Quash Service and Dismiss for Lack of Personal Jurisdiction, filed by Defendant Patrick Nunally. Noting Date 5/13/2025, (TE)



Att: 1  (Appears as Duplicate) Motion to Quash Service and Dismiss for Lack of Personal Jurisdiction,

Att: 2   4 pgs Declaration


Tuesday, April 15, 2025

144  **order** **2 - Minute Order** **Tue 04/15 4:24 PM**



MINUTE ORDER entered at the direction of Magistrate Judge Theresa L Fricke. Counsel for the State of Washington contacted the Court on April 15, 2025, to request clarification on the Court's April 9, 2025, order (Dkt.143). Counsel for Landmark Technology A, LLC, and Raymond Mercado were copied on the email. Counsel requests clarification on the term "parties" and which parties are expected to confer and submit a joint proposed scheduling order by May 5. Until the new defendants, Melody Camp and Patrick Nunally, have filed an answer to the operative complaint and are ready to engage in the discovery process, the "parties" will be defined as the State of Washington, Landmark Technology A, LLC, and Raymond Mercado. The Court expects the State of Washington, Landmark Technology A, LLC, and Raymond Mercado to meet and confer and submit a joint scheduling order by May 5. The proposed scheduling order should indicate their positions with respect to the amount of time it will take to complete discovery with the newly added defendants, Melody Camp and Patrick Nunally. (GMR)

Wednesday, April 09, 2025**143**   **order** **1 - Order** **Wed 04/09 4:23 PM**



ORDER re 142 Minute Entry - Status Conference. The State is ordered to serve the list of proposed depositions of individuals and Fed. R. Civ. P. 30(b)(6) depositions, and the discovery requests it intends to propound on Defendants Landmark Technology, LLC and Raymond Mercado on Defendants' counsel on or before 4/21/2025. The parties are ordered to meet and confer, to reach agreement on discovery by 5/2/2025. They are directed to file with the Court a status report informing Chief Magistrate Judge Theresa Fricke of their areas of agreement, and whether the Defendants object to any of Plaintiff's proposed discovery. The parties are also ordered to file with the Court a joint proposed scheduling order on or before 5/5/2025. Senior District Judge Ricardo S. Martinez will consider the parties proposal and determine whether a scheduling order should be entered at that time. Signed by Judge Theresa L Fricke. (CJS)

Tuesday, April 08, 2025**142**  **minutes** **Status Conference** **Wed 04/09 12:18 PM**



MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: Gayle Riekema ; Pla Counsel: Ben Brysacz, Robert Hyde ; Def Counsel: James Ware, Justin Walsh ; CR: Angela Nicolavo ; Time of Hearing: 4:00pm ; Zoom Status Conference held on 4/8/2025. Court hears from parties re discovery issues. Deadlines agreed upon re additional discovery list. Written order to issue. (GMR)

141   **notice** **Notice of Appearance** **Tue 04/08 9:48 AM**




NOTICE of Appearance by attorney Emelia Hickok on behalf of Defendant Melody Camp. (Hickok, Emelia)

140   **notice** **Notice of Appearance** **Tue 04/08 9:46 AM**



NOTICE of Appearance by attorney Lorianne Hanson on behalf of Defendant Melody Camp. (Hanson, Lorianne)

Monday, April 07, 2025**139**   **utility** **Case/IFP Deficiency Letter** **Mon 04/07 3:58 PM**

Notice of Filing Deficiency re137 MOTION to Dismiss for Lack of Personal Jurisdiction ,138 Declaration (non motion). ***Action Required*** Compliance with LCR 83.2 - Attorney Appearance and Withdrawal, Improper Signature - Secondary Attorney(s). See attached letter for more information and instructions. (CJS)(cc: attorneys Hanson and Hickok via Ad Hoc NEF)

138    **3 pgs** **misc** **Declaration (non motion)** **Mon 04/07 3:36 PM**




DECLARATION of Melody Camp re137 MOTION to Dismiss for Lack of Personal Jurisdiction by Defendant Melody Camp (Hanson, Lorianne)

137   **motion** **Dismiss** **Mon 04/07 3:35 PM**

MOTION to Dismiss for Lack of Personal Jurisdiction , filed by Defendant Melody Camp. Oral Argument Requested. Noting Date: 5/5/2025. (Hanson, Lorianne) Modified to add noting date per LCR 7(d)(4) on 4/7/2025 (CJS)

utility **Set/Reset Motion Noting Date (Public)** **Mon 04/07 4:02 PM**

Noting Date Set re137 MOTION to Dismiss for Lack of Personal Jurisdiction : Noting Date 5/5/2025. (CJS)

Friday, April 04, 2025**136**    **8 pgs** **misc** **Joint Status Report** **Fri 04/04 1:20 PM**



JOINT STATUS REPORT signed by all parties. (Brysacz, Ben)

Monday, March 31, 2025**Thursday, March 20, 2025**

134 [minutes](#) [Status Conference](#) [Fri 03/21 5:08 PM](#)




MMINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: Gayle Riekena; Pla Counsel: Ben Brysacz, Aaron Fickes; Def Counsel: James Ware, Justin Walsh; CR: Angela Nicolavo; Time of Hearing: 4:00pm; Zoom Status Conference held on 3/20/2025. Court hears from parties re discovery issues/search terms as well as the upcoming hearing and associated deadline. (GMR)

Tuesday, March 11, 2025

133   [notice](#) [Notice of Withdrawal of Counsel](#) [Tue 03/11 3:16 PM](#)

NOTICE OF WITHDRAWAL OF COUNSEL: Attorney Heidi C Anderson for Plaintiff State of Washington. (Anderson, Heidi)

Monday, March 03, 2025

132    [2 pgs](#) [order](#) [1 - Order ~Util - Set/Reset Hearings](#) [Mon 03/03 11:04 AM](#)



ORDER re 129 Minute Entry re Status Conference. If discovery has not been completed by April 4, 2025, the Court will conduct a hearing on Tuesday, April 8, 2025, at 4:00 pm on Zoom. This will be a status conference, and the parties must file a joint status report by 5:00 pm on April 4, 2025, to inform the Court of: (1) the date they believe discovery will be complete; (2) describe the additional discovery steps they believe are necessary; (3) prepare a chart showing when each of those steps will be finished, and (4) the reasons why discovery has not yet been completed. Status Conference set for 4/8/2025 at 04:00 PM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. Signed by Judge Theresa L Fricke. (CJS)

Friday, February 28, 2025

131 [notice](#) [Notice of Rescheduled Hearing](#) [Fri 02/28 10:04 AM](#)

NOTICE OF RESCHEDULED HEARING Status Conference re search terms set for 3/20/2025 at 4:00 PM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. (GMR)

Friday, February 21, 2025

130   [service](#) [Waiver of Service](#) [Fri 02/21 1:36 PM](#)




WAIVER OF SERVICE of Summons upon defendant Melody Camp mailed on 2/7/2025 (Brysacz, Ben)

Thursday, February 20, 2025

129 [minutes](#) [Status Conference](#) [Fri 02/21 1:12 PM](#)




MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: Gayle Riekena; Pla Counsel: Ben Brysacz, Robert Hyde; Def Counsel: James Ware, Justin Walsh; CR: Sheri Schelbert; Time of Hearing: 4:00pm; Zoom Status Conference held on 2/20/2025. Court hears from parties re discovery issues. Upcoming deadlines and status conference dates agreed upon by parties. Written order to issue. Status Conference re search terms set for 3/21/2025 at 4:00 PM via Zoom before Judge Theresa L Fricke. Discovery Status Conference set for 4/8/2025 at 4:00 PM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. (GMR)

Tuesday, February 18, 2025



128    [3 pgs](#) [misc](#) [Status Report](#) [Tue 02/18 2:22 PM](#)

Second STATUS REPORT to Special Master re: Search Terms and Discovery Staging by Plaintiff State of Washington (Brysacz, Ben)




Wednesday, January 15, 2025

127    [2 pgs](#) [service](#) [Summons Issued](#) [Wed 01/15 9:27 AM](#)

Summons(es) Electronically Issued as to defendant(s) Melody Camp, Patrick Nunally.(TE)

Att: 1   [2 pgs](#) Summons



Tuesday, January 14, 2025

126    [47 pgs](#) [cmp](#) [Amended Complaint](#) [Tue 01/14 4:12 PM](#)

Second AMENDED COMPLAINT against defendant(s) Landmark Technology A LLC, Raymond Mercado, Patrick Nunally, Melody Camp filed by State of Washington.(Hyde, Robert)



Att: 1   [2 pgs](#) Summons to Patrick Nunally,

Att: 2   [2 pgs](#) Summons to Melody Camp

125   4 pgs order Order on Motion to Compel Tue 01/14 11:50 AM

SUPPLEMENTAL ORDER ON THE STATE OF WASHINGTON'S MOTION TO COMPEL (Dkt.89). The Court fully incorporates Judge Martinez's October 22, 2024, order (Dkt.106) and finds that any remaining discovery issues raised in the States motion to compel are DENIED without prejudice. (See Order for details.) Signed by Judge Theresa L Fricke.(CJS)

Monday, January 13, 2025



124   order 1 - Order Mon 01/13 10:35 AM

ORDER re status conference about discovery progress (See Dkts.120 , 121). For further instruction on what the parties should do if they are unable to reach an agreement on a discovery issue, the parties should refer to the Court's order dated November 22, 2024. Dkt.118 . Signed by Judge Theresa L Fricke. (CJS)

Tuesday, January 07, 2025



123 minutes Status Conference ~Util - Set Hearings Wed 01/08 5:49 PM

MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: Gayle Riekema ; Pla Counsel: Ben Brysacz, Robert Hyde ; Def Counsel: James Ware, Justin Walsh ; CR: Angela Nicolavo ; Time of Hearing: 4:00pm ; Zoom Status Conference held on 1/7/2025. Court hears from parties re discovery issues. Written Order to issue re89 Motion to Compel. Next status conference date/time agreed upon by parties. Status Conference set for 2/20/2025 at 4:00 PM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Calendar] page at least 24 hours prior to the hearing. (GMR)

122   6 pgs order Order on Motion to Amend Tue 01/07 4:10 PM

ORDER granting Plaintiff's105 Second Motion to Amend. The Court hereby finds and ORDERS that the State of Washington's Motion to Amend, Dkt. #105 , is GRANTED. Signed by Judge Ricardo S. Martinez. (KRA)

Monday, January 06, 2025



121   misc Joint Status Report Mon 01/06 3:40 PM

JOINT STATUS REPORT signed by all parties. Filed by Plaintiff State of Washington.(Brysacz, Ben)

Att: 1   8 pgs Defendants' Search Terms,

Att: 2   6 pgs Plaintiff's Search Terms

Tuesday, December 10, 2024

120   order 1 - Order Tue 12/10 11:50 AM



ORDER re 12/2/2024 status conference and discovery progress. If certain tasks are partially completed before the status conference to be held on 1/7/2025 (via Zoom), the parties should be prepared to discuss their proposed project plan to complete those tasks. For further instruction on what the parties should do if they are unable to reach an agreement on a discovery issue, the parties should refer to the Court's order dated 11/22/2024. Dkt.118 . Signed by Judge Theresa L Fricke. (CJS)

Monday, December 02, 2024

119 minutes Status Conference Mon 12/02 5:34 PM

MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: K Miller ; Pla Counsel: Ben Brysacz and Robert Hyde ; Def Counsel: James Ware and Justin Walsh ; CR: Andrea Ramirez ; Time of Hearing: 10:00 AM ; Session #: Zoom ; Status Conference held on 12/2/2024. Court hears updates from parties as to items identified during previous Status Hearing. Status Conference set for 1/7/2025 at 04:00 PM before Judge Theresa L Fricke via Zoom. The court will provide remote audio and video public access for this hearing. Access information can be found on the court's[LINK:Public Access to Hearings] page at least 24 hours prior to the hearing. (KAM)

Friday, November 22, 2024

118   order 1 - Order Fri 11/22 10:28 AM

ORDER re 116 Status Conference and Discovery Plan. The Court ordered the parties to meet and confer on discovery projects, and be prepared to provide the Court with a status update on their progress, their agreements, and their efforts to reach agreements, during the next status conference (to be held via Zoom, see Dkt. 117) on December 2, 2024. (See Order for details.) Signed by Judge Theresa L Fricke. (CJS)

Wednesday, November 13, 2024

117 [notice](#) [Notice of Hearing](#) [Wed 11/13 12:49 PM](#)


NOTICE of Hearing: Status Conference set for 12/2/2024 at 10:00 AM via Zoom before Judge Theresa L Fricke. The court will provide remote audio public access for this hearing. Access information can be found on the court's[LINK:Public Access to Hearings] page at least 24 hours prior to the hearing. (GMR)

Tuesday, November 12, 2024

116 [minutes](#) [Status Conference](#) [Tue 11/12 4:26 PM](#)

MINUTE ENTRY for proceedings held before Judge Theresa L Fricke- Dep Clerk: Gayle Riekema ; Pla Counsel: Ben Brysacz, Robert Hyde ; Def Counsel (telephonic): James Ware, Justin Walsh ; CR: Angela Nicolavo ; Time of Hearing: 10:30 am ; Courtroom: F ; Status Conference held on 11/12/2024. Court heard from parties. Parties to meet and confer on items discussed during hearing and will be expected to provide the Court with a status update on December 2nd, via Zoom. Courtroom deputy to coordinate with parties. (GMR)

Friday, November 08, 2024

115  [respm](#) [Declaration](#) [Fri 11/08 10:57 AM](#)

DECLARATION of Bob Hyde filed by Plaintiff State of Washington re105 Second MOTION to Amend Complaint(Hyde, Robert)

Att: 1 [respm](#) Exhibit A

114  [respm](#) [Reply to Response to Motion](#) [Fri 11/08 10:54 AM](#)


REPLY, filed by Plaintiff State of Washington, TO RESPONSE to105 Second MOTION to Amend Complaint (Hyde, Robert)

Thursday, November 07, 2024

113 [notice](#) [Notice of Hearing](#) [Thu 11/07 9:35 AM](#)


NOTICE of Hearing: Status Conference is set for 11/12/2024 at 10:00 AM before Judge Theresa L Fricke in Courtroom F at the Union Station Courthouse. (The court will not provide remote public access for this hearing.)(GMR)

Wednesday, November 06, 2024


112  [notice](#) [Notice-Other](#) [Wed 11/06 1:55 PM](#)

RULE 53 DECLARATION OF UNITED STATES MAGISTRATE JUDGE THERESA L. FRICKE. (MW)


Friday, November 01, 2024

111  [misc](#) [Proposed Order \(Unsigned\)](#) [Fri 11/01 6:27 PM](#)


PROPOSED ORDER (Unsigned) re108 Response to Motion (Walsh, Justin)

110  [respm](#) [Declaration](#) [Fri 11/01 6:22 PM](#)

DECLARATION of Raymond Mercado filed by All Defendants re105 Second MOTION to Amend Complaint (Walsh, Justin)


109  [respm](#) [Declaration](#) [Fri 11/01 6:20 PM](#)

DECLARATION of Justin P. Walsh filed by All Defendants re105 Second MOTION to Amend Complaint (Walsh, Justin)

108  [respm](#) [Response to Motion](#) [Fri 11/01 6:19 PM](#)


RESPONSE, by All Defendants, to105 Second MOTION to Amend Complaint . (Walsh, Justin)

Thursday, October 31, 2024

107  [3 pgs](#) [order](#) [Order Referring Case](#) [Thu 10/31 12:40 PM](#)


ORDER REFERRING PENDING AND SUBSEQUENT DISCOVERY MOTIONS TO MAGISTRATE JUDGE THERESA L. FRICKE AS SPECIAL MASTER. Pursuant to Rule 53(a)(1)(C) and (h), and the parties' agreement, the Court appoints Magistrate Judge Theresa L. Fricke to serve as Special Master. Signed by Judge Ricardo S. Martinez. (TE)

Tuesday, October 22, 2024

106  [6 pgs](#) [order](#) [Order on Motion to Compel ~Util - Terminate Motions ~Util - Terminate Deadlines/Hearings ~Util - Terminate Trial Date and Related Deadlines](#) [Tue 10/22 4:23 PM](#)

ORDER89 GRANTING IN PART MOTION TO COMPEL. The Court will STRIKE the trial date and the Motions at Dkt. #71 and Dkt. #73 . The Court direct the parties to either re-file such briefing within their future dispositive Motions or to file separate Motions on this topic after the pleadings in this case are finalized. Signed by Judge Ricardo S. Martinez. (TE)

Friday, October 18, 2024

105 ☆  motion Amend Fri 10/18 2:42 PM

Second MOTION to Amend Complaint , filed by Plaintiff State of Washington. Noting Date 11/8/2024, (Brysacz, Ben)

Att: 1  Amended Complaint,


Att: 2  Proposed Order

Wednesday, October 09, 2024


104 minutes Status Conference ~Util - Terminate Deadlines and Hearings ~Util - Terminate Trial Date and Related Deadlines Wed 10/09 11:14 AM

MINUTE ENTRY for proceedings held before Judge Ricardo S. Martinez- Dep Clerk: Laurie Cuaresma ; Pla Counsel: Ben Brysacz, Heidi Anderson ; Def Counsel: Justin Walsh, James Ware ; CR: Nickie Drury ; Time of Hearing: 10:00 AM ; STATUS CONFERENCE held on 10/9/2024. Counsel advise the Court regarding the current status of discovery and related issues. In light of the current status of discovery and the plaintiff's intention to file a motion for leave to amend the complaint, the Court STRIKES the 10/21/24 trial date in this matter and all pending deadlines. (LC)

Friday, September 06, 2024

103 ☆  2 pgs order Order on Stipulated Motion ~Util - Terminate Deadlines/Hearings Fri 09/06 2:21 PM


ORDER granting Parties'102 Stipulated MOTION to Extend Stay. All currently pending deadlines in this matter are hereby STAYED through 10/9/2024, the date of the in-person status conference with the Court. Signed by Judge Ricardo S. Martinez. (SB)

102 ☆  motion Stipulated Motion Fri 09/06 9:18 AM

Stipulated MOTION to Extend Stay , filed by Plaintiff State of Washington. Noting Date 9/6/2024, (Brysacz, Ben)


Att: 1  Proposed Order

Tuesday, July 30, 2024

101 ☆  respm Declaration Tue 07/30 2:44 PM


DECLARATION of Justin P. Walsh filed by All Defendants re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Walsh, Justin)

Att: 1  Exhibit 1

100 ☆  respm Declaration Tue 07/30 2:42 PM


DECLARATION of Raymond Mercado filed by All Defendants re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT (Walsh, Justin)

Wednesday, July 24, 2024

99 ☆  respm Declaration Wed 07/24 4:06 PM


DECLARATION of Heidi Anderson filed by Plaintiff State of Washington re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Brysacz, Ben)

Att: 1  Exhibit U

98 ☆  respm Declaration Wed 07/24 4:04 PM

DECLARATION of Bob Hyde filed by Plaintiff State of Washington re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Brysacz, Ben)

Att: 1  Exhibit T

97 ☆  respm Declaration Wed 07/24 4:02 PM

Supplemental DECLARATION of Ben Brysacz filed by Plaintiff State of Washington re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Brysacz, Ben)

Att: 1  Exhibit K,

Att: 2  Exhibit L,

Att: 3  Exhibit M,

Att: 4  Exhibit N,

Att: 5  Exhibit O,

Att: 6  Exhibit P,

Att: 7  Exhibit Q,

Att: 8  Exhibit R,

Att: 9  Exhibit S

96 ☆  respm Reply to Response to Motion Wed 07/24 3:56 PM

REPLY, filed by Plaintiff State of Washington, TO RESPONSE to89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Brysacz, Ben)



Att: 1  Proposed Order

Thursday, July 18, 2024

95 ☆   9 pgs respm Declaration Thu 07/18 4:30 PM

DECLARATION of Justin P. Walsh filed by All Defendants re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Walsh, Justin)

Att: 1  Exhibit 1,

Att: 2   23 pgs Exhibit 2,

Att: 3  Exhibit 3,

Att: 4  Exhibit 4,



Att: 5  Exhibit 5,



Att: 6  Exhibit 6,

Att: 7  Exhibit 7,

Att: 8  Exhibit 8,

Att: 9  Exhibit 9,

Att: 10   13 pgs Exhibit 10,

Att: 11   8 pgs Exhibit 11,

Att: 12  Exhibit 12,


Att: 13  Exhibit 13,


Att: 14  Exhibit 14,

Att: 15  Exhibit 15,

Att: 16  Exhibit 16,

Att: 17  Exhibit 17,


Att: 18  Exhibit 18


94 ☆  respm Declaration Thu 07/18 4:26 PM

DECLARATION of John Lee filed by All Defendants re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Walsh, Justin)


Att: 1  Exhibit 1,

Att: 2  Exhibit 2,


Att: 3  Exhibit 3

93 ☆  respm Declaration Thu 07/18 4:21 PM


DECLARATION of Raymond Mercado filed by All Defendants re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT (Walsh, Justin)

92 ☆  respm Response to Motion Thu 07/18 4:17 PM

RESPONSE, by All Defendants, to89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT .(Walsh, Justin)












Att: 1  Proposed Order ORDER DENYING STATES MOTION TO COMPEL BUT GRATNING THE STATES UNOPPOSED REQUEST TO ADJUST DEADLINES



Wednesday, July 10, 2024


91 ☆  order 1 - Order ~Util - Set/Reset Deadlines/Hearings Wed 07/10 4:12 PM

ORDER re Plaintiff's89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT . The Court ORDERS that Plaintiff's89 Motion is GRANTED IN PART. All currently pending deadlines in this matter, including Defendants' deadline to disclose rebuttal expert reports and the deadline for dispositive motions, are STAYED for a period of 60 days. The parties shall appear at an in-person status conference on October 9, 2024, at 10:00 a.m. All other requests for relief in Plaintiff's Motion, Dkt. [#89], shall be addressed after the noting date of July 24, 2024. Signed by Judge Ricardo S. Martinez. (SS)


Wednesday, July 03, 2024

- 90 ☆  **respm** **Declaration** **Wed 07/03 9:12 PM**
DECLARATION of Ben Brysacz filed by Plaintiff State of Washington re89 MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT(Brysacz, Ben)
- Att: 1  Exhibit A,
Att: 2  Exhibit B,
Att: 3  Exhibit C,
Att: 4  Exhibit D,
Att: 5  Exhibit E,
Att: 6  Exhibit F,
Att: 7  Exhibit G,
Att: 8  Exhibit H,
Att: 9  Exhibit I,
Att: 10  Exhibit J
-

- 89 ☆  **motion** **Compel** **Wed 07/03 9:02 PM**
MOTION to Compel STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT , filed by Plaintiff State of Washington. Noting Date 7/24/2024, (Brysacz, Ben)
- Att: 1  Proposed Order ORDER GRANTING STATES MOTION TO COMPEL AND FOR RELIEF FROM DEADLINES TO ADDRESS POTENTIAL DISCOVERY MISCONDUCT
-

- 88 ☆  **notice** **Notice of Attorney Association** **Wed 07/03 8:36 AM**
NOTICE of Association of Attorney by James P Ware on behalf of Counter Claimant Landmark Technology A LLC, Counter Defendant Landmark Technology A LLC, Defendants Landmark Technology A LLC, Raymond Mercado. (Ware, James)
-




Monday, June 24, 2024

- 87 ☆  **3 pgs** **order** **Order on Stipulated Motion ~Util - Set/Reset Deadlines/Hearings ~Util - Terminate Motions** **Mon 06/24 9:56 AM**
ORDER granting Parties'86 Stipulated MOTION re: Expert Reports. State's expert witnesses, disclosed 5/31/2024, shall be considered timely. LTA's rebuttal expert reports pursuant to Rule 26(a)(2)(d)(ii) shall be due 7/8/2024, on the condition LTA's rebuttal expert shall be deposed within thirty (30) days of 7/8/2024. LTA hereby withdraws its Motion to Strike or to Extend Deadline for Rebuttal Reports (Dkt. No.84). Signed by Judge Ricardo S. Martinez. (SB)
-




Friday, June 21, 2024


- 86 ☆  **motion** **Stipulated Motion** **Fri 06/21 1:07 PM**
Stipulated MOTION and Proposed Order re: Expert Reports , filed by All Defendants. Noting Date 6/21/2024, (Walsh, Justin)
-

Friday, June 14, 2024

- 85 ☆  **respm** **Declaration** **Fri 06/14 12:55 PM**
DECLARATION of Justin P. Walsh filed by All Defendants re84 MOTION to Exclude State's Experts or, alternatively, for Extension of Time for Rebuttal (Walsh, Justin)
- 84 ☆  **motion** **Exclude** **Fri 06/14 12:53 PM**
MOTION to Exclude State's Experts or, alternatively, for Extension of Time for Rebuttal , filed by All Defendants. Noting Date 7/5/2024, (Walsh, Justin)
- Att: 1  Proposed Order
-


Monday, June 03, 2024

- 83 ☆  **respm** **Declaration** **Mon 06/03 4:43 PM**
DECLARATION of Justin P. Walsh filed by All Defendants re73 CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH (Walsh, Justin)
- 82 ☆  **respm** **Reply to Response to Motion** **Mon 06/03 4:37 PM**
REPLY, filed by All Defendants, TO RESPONSE to73 CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH(Walsh, Justin)
- Att: 1  Exhibit
-

81 ☆  2 pgs order Order on Stipulated Motion Mon 06/03 11:35 AM

ORDER granting Parties'79 Stipulated MOTION for Order Authorizing Disclosure of Civil Investigative Demand Responses in Discovery. Signed by Judge Ricardo S. Martinez. (SB)

Wednesday, May 29, 2024

80 ☆  respm Declaration Wed 05/29 11:03 AM


DECLARATION of HEIDI C. ANDERSON filed by Plaintiff State of Washington re79 Stipulated MOTION FOR ORDER RE: CID PRODUCTION (Fickes, Aaron)

79 ☆  motion Stipulated Motion Wed 05/29 11:01 AM

Stipulated MOTION FOR ORDER RE: CID PRODUCTION , filed by Plaintiff State of Washington. Noting Date 5/29/2024, (Fickes, Aaron)

Att: 1  Proposed Order

Tuesday, May 28, 2024


78 ☆  respm Reply to Response to Motion Tue 05/28 2:46 PM

REPLY, filed by Plaintiff State of Washington, TO RESPONSE to73 CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH (Brysacz, Ben)

Wednesday, May 08, 2024


77 ☆  4 pgs order Order on Stipulated Motion ~Util - Set Motion and R&R Deadlines/Hearings ~Util - Set/Reset Motion Noting Date Wed 05/08 3:57 PM

ORDER re Parties'76 Stipulated Motion Re Briefing Schedule on Cross Motions (Dkts.71 &73). State's Combined Reply and Response Brief due by 5/28/2024, Landmark's Reply Brief due by 6/3/2024. Motions noted for 6/3/2024. Signed by Judge Ricardo S. Martinez. (MJV)

76 ☆  motion Stipulated Motion Wed 05/08 1:05 PM

Stipulated MOTION RE: BRIEFING SCHEDULE ON CROSS MOTIONS , filed by Plaintiff State of Washington. Noting Date 5/8/2024, (Hyde, Robert)


Monday, May 06, 2024

75 ☆  respm Declaration Mon 05/06 5:06 PM

DECLARATION of Justin P. Walsh filed by All Defendants re73 CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH(Walsh, Justin)

Att: 1  Exhibit 1,


Att: 2  Exhibit 2

74 ☆  respm Declaration Mon 05/06 5:04 PM

DECLARATION of Raymond Mercado filed by All Defendants re73 CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH(Walsh, Justin)

Att: 1  Exhibit 1,

Att: 2  Exhibit 2,

Att: 3  Exhibit 3,

Att: 4  Exhibit 4,

Att: 5  Exhibit 5,

Att: 6  Exhibit 6,

Att: 7  Exhibit 7,

Att: 8  Exhibit 8,

Att: 9  Exhibit 9,

Att: 10  Exhibit 10,


Att: 11  Exhibit 11,

Att: 12  Exhibit 12,

Att: 13  Exhibit 13,

Att: 14  Exhibit 14,


Att: 15  Exhibit 15

73 ☆  motion Cross Motion Mon 05/06 4:57 PM


CROSS MOTION AND RESPONSE re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH , filed by All Defendants.
Noting Date 6/3/2024, (Walsh, Justin)


Att: 1  Proposed Order


Thursday, April 18, 2024

72 ☆  respm Declaration Thu 04/18 11:21 AM

DECLARATION of Ben Brysacz filed by Plaintiff State of Washington re71 MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH(Brysacz, Ben)

Att: 1  Exhibit Exhibit A,

Att: 2  Exhibit Exhibit B,


Att: 3  Exhibit Exhibit C

71 ☆  motion Miscellaneous Relief Thu 04/18 11:14 AM

MOTION RULING RE: APPLICABLE LEGAL TEST FOR BAD FAITH , filed by Plaintiff State of Washington. Noting Date 5/10/2024, (Brysacz, Ben)


Att: 1  Proposed Order

Tuesday, April 09, 2024

70 ☆  misc Stipulation Tue 04/09 10:18 AM


STIPULATION TO EXTEND DEADLINE FOR EXPERT DISCLOSURES by parties (Brysacz, Ben)

Monday, October 23, 2023

69 ☆  order Protective Order Mon 10/23 4:07 PM

STIPULATED PROTECTIVE ORDER. Signed by Judge Ricardo S. Martinez. (SB)


Friday, October 20, 2023

68 ☆  misc Proposed Order (Unsigned) Fri 10/20 3:02 PM

PROPOSED ORDER (Unsigned) Stipulated Protective Order(Fickes, Aaron)


Att: 1  Redline version

Thursday, August 17, 2023

67 ☆  misc Notice to Withdraw Pending Motion Thu 08/17 5:44 PM

NOTICE to Withdraw Pending Motion re62 MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES ; by All Defendants. (Walsh, Justin)

Monday, August 14, 2023

66 ☆  respm Declaration Mon 08/14 6:13 PM


DECLARATION of Aaron J. Fickes filed by Plaintiff State of Washington re62 MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES(Fickes, Aaron)

Att: 1  Exhibit 1,


Att: 2  Exhibit 2,

Att: 3  Exhibit 3,


Att: 4  Exhibit 4

65 ☆  respm Response to Motion Mon 08/14 6:09 PM


RESPONSE, by Plaintiff State of Washington, to62 MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES .(Fickes, Aaron)

Att: 1  Proposed Order Denying Motion to Require Compliance with LPRs






Thursday, August 03, 2023

64 ☆  misc Proposed Order (Unsigned) Thu 08/03 2:58 PM

PROPOSED ORDER (Unsigned) re62 MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES (Walsh, Justin)

63 ☆  misc Declaration (non motion) Thu 08/03 2:51 PM


DECLARATION of Justin P. Walsh re62 MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES by All Defendants(Walsh, Justin)

Att: 1  Exhibit 1,
Att: 2  Exhibit 2,
Att: 3  Exhibit 3,
Att: 4  Exhibit 4,
Att: 5  Exhibit 5

62 ☆  motion Miscellaneous Relief Thu 08/03 2:47 PM


MOTION TO REQUIRE COMPLIANCE WITH LOCAL PATENT RULES , filed by All Defendants. Noting Date 8/18/2023, (Walsh, Justin)

Thursday, July 27, 2023





61 ☆  misc Notice to Withdraw Pending Motion Thu 07/27 7:17 PM

NOTICE to Withdraw Pending Motion re59 MOTION REQUIRE COMPLIANCE WITH LOCAL PATENT RULES ; by All Defendants. (Walsh, Justin)

Thursday, July 20, 2023

60 ☆  misc Declaration (non motion) Thu 07/20 5:32 PM

DECLARATION of Justin P. Walsh re59 MOTION REQUIRE COMPLIANCE WITH LOCAL PATENT RULES by All Defendants(Walsh, Justin)


Att: 1  Exhibit 1,
Att: 2  Exhibit 2,
Att: 3  Exhibit 3,
Att: 4  Exhibit 4

59 ☆  motion Miscellaneous Relief Thu 07/20 5:24 PM

MOTION REQUIRE COMPLIANCE WITH LOCAL PATENT RULES , filed by All Defendants. Noting Date 8/4/2023, (Walsh, Justin)


Att: 1  Proposed Order

Monday, June 05, 2023

58 ☆  notice Notice of Appearance Mon 06/05 11:36 AM


NOTICE of Appearance by attorney Michael K Davis-Hall on behalf of Plaintiff State of Washington. (Davis-Hall, Michael)

Monday, April 24, 2023


57 ☆  3 pgs order Order on Motion to Amend ~Util - Set/Reset Deadlines/Hearings Mon 04/24 3:02 PM

ORDER granting Plaintiff's55 Motion to Amend Order Setting Trial Dates and Related Dates. Bench Trial is set for 10/21/2024 before Judge Ricardo S. Martinez. Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 4/17/2024, Motions related to discovery due by 5/3/2024, Discovery completed by 6/28/2024, Dispositive motions due by 7/26/2024, 39.1 mediation to be completed by 9/13/2024, Motions in Limine due by 9/27/2024, Agreed Pretrial Order due by 10/11/2024, Trial briefs and proposed findings of fact and conclusions of law, designations of deposition testimony pursuant to LCR 32(e), and trial exhibits due by 10/18/2024. Signed by Judge Ricardo S. Martinez. (SB)

Thursday, April 20, 2023

56 ☆  respm Declaration Thu 04/20 4:37 PM


DECLARATION of Aaron J. Fickes filed by Plaintiff State of Washington re55 MOTION to Amend42 Order Setting Trial Date and Related Dates,,, (Fickes, Aaron)

55 ☆  motion Amend Thu 04/20 4:33 PM


MOTION to Amend42 Order Setting Trial Date and Related Dates,,, , filed by Plaintiff State of Washington. Noting Date 4/20/2023, (Fickes, Aaron)

Att: 1  Proposed Order

Wednesday, March 15, 2023

-
- 54 ☆  4 pgs order Order on Motion for Miscellaneous Relief ~Util - Add and Terminate Parties Wed 03/15 8:49 AM
ORDER granting Plaintiff's48 Motion to Strike Counterclaims. Defendant's counterclaims are STRICKEN. Signed by Judge Ricardo S. Martinez. (SB)
-


Friday, February 17, 2023

-
- 53 ☆  respm Reply to Response to Motion Fri 02/17 11:51 AM
REPLY, filed by Plaintiff State of Washington, TO RESPONSE to48 MOTION to Strike (Brysacz, Ben)
-




Monday, February 13, 2023

-
- 52 ☆  respm Declaration Mon 02/13 4:37 PM
DECLARATION of Justin P. Walsh filed by Counter Claimant Landmark Technology A LLC, Defendants Landmark Technology A LLC, Raymond Mercado re48 MOTION to Strike (Walsh, Justin)
-
- 51 ☆  respm Response to Motion Mon 02/13 4:28 PM
RESPONSE, by Counter Claimant Landmark Technology A LLC, Defendants Landmark Technology A LLC, Raymond Mercado, to48 MOTION to Strike .(Walsh, Justin)
- Att: 1  Proposed Order Denying Plaintiff's Motion to Strike
-


Thursday, February 02, 2023

-
- 50 ☆  misc Joint Status Report Thu 02/02 1:26 PM
JOINT STATUS REPORT signed by all parties. Estimated Trial Days: 15. (Walsh, Justin)
-

Friday, January 27, 2023





-
- 49 ☆  respm Declaration Fri 01/27 4:17 PM
DECLARATION of Aaron J. Fickes filed by Plaintiff State of Washington re48 MOTION to Strike (Fickes, Aaron)
-
- 48 ☆  motion Miscellaneous Relief Fri 01/27 4:11 PM
MOTION to Strike , filed by Plaintiff State of Washington. Noting Date 2/17/2023, (Brysacz, Ben)
- Att: 1  Proposed Order
-

Wednesday, January 18, 2023


-
- 47 ☆  notice Notice of Appearance Wed 01/18 8:22 AM
NOTICE of Appearance by attorney Robert A Hyde on behalf of Plaintiff State of Washington. (Hyde, Robert)
-

Friday, January 13, 2023



Friday, January 06, 2023

-
- 45 ☆  answer Answer to Amended Complaint Counterclaim Fri 01/06 4:10 PM
ANSWER to43 Amended Complaint with JURY DEMAND, COUNTERCLAIM against plaintiff Landmark Technology A LLC by Landmark Technology A LLC.(Walsh, Justin)
- Att: 1  Exhibit Exhibit A,
Att: 2  Exhibit Exhibit B,
Att: 3  Exhibit Exhibit C
-


Monday, December 19, 2022

-
- 44 ☆  service Summons Issued Mon 12/19 9:36 AM
Summons(es) Electronically Issued as to defendant(s) Raymond Mercado. (SB)
-

Friday, December 16, 2022


-
- 43 ☆  cmp Amended Complaint Fri 12/16 12:01 PM
AMENDED COMPLAINT against defendant(s) Landmark Technology A LLC, filed by State of Washington.(Brysacz, Ben)
- Att: 1  Summons Raymond Mercado
-

Tuesday, December 06, 2022

42 ☆  [order](#) [RSM Order Setting Trial Date and Related Dates \(FORM\)](#) [Tue 12/06 10:28 AM](#)

ORDER SETTING TRIAL DATE AND RELATED DATES by Judge Ricardo S. Martinez. Bench Trial is set for 11/27/2023 at 09:00 AM before Judge Ricardo S. Martinez. Length of Trial: *TBD*. Joinder of Parties due by 1/3/2023, Amended Pleadings due by 1/3/2023, Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 5/31/2023, Motions due by 6/30/2023, Discovery completed by 7/31/2023, Dispositive motions due by 8/29/2023, 39.1 mediation to be completed by 10/13/2023, Motions in Limine due by 10/30/2023, Pretrial Order due by 11/15/2023, Trial briefs to be submitted by 11/22/2023, Proposed Findings of Fact and Conclusions of Law to be submitted by 11/22/2023. (LC)

Monday, December 05, 2022

41 ☆  [4 pgs](#) [order](#) [Order on Motion to Amend](#) [Mon 12/05 3:21 PM](#)


ORDER granting Plaintiff's36 Motion to Amend. A scheduling order setting a trial date and related deadlines will follow. Signed by Judge Ricardo S. Martinez. (SB)

Friday, December 02, 2022

40 ☆  [respm](#) [Reply to Response to Motion](#) [Fri 12/02 2:24 PM](#)

REPLY, filed by Plaintiff State of Washington, TO RESPONSE to36 MOTION to Amend Complaint (Fickes, Aaron)


Friday, November 25, 2022

39 ☆  [respm](#) [Response to Motion](#) [Fri 11/25 4:00 PM](#)


RESPONSE, by Defendant Landmark Technology A LLC, to36 MOTION to Amend Complaint .(Walsh, Justin)

Att: 1  Proposed Order


Monday, November 14, 2022

38 ☆  [notice](#) [Notice of Appearance](#) [Mon 11/14 4:51 PM](#)


NOTICE of Appearance by attorney Justin Patrick Walsh on behalf of Defendant Landmark Technology A LLC. (Walsh, Justin)

37 ☆  [misc](#) [Proposed Order \(Unsigned\)](#) [Mon 11/14 12:33 PM](#)


PROPOSED ORDER (Unsigned) re36 MOTION to Amend Complaint (Brysacz, Ben)

36 ☆  [motion](#) [Amend](#) [Mon 11/14 11:51 AM](#)

MOTION to Amend Complaint , filed by Plaintiff State of Washington. Noting Date 12/2/2022, (Brysacz, Ben)


Att: 1  Amended Complaint

Friday, October 28, 2022

35 ☆  [12 pgs](#) [order](#) [Order on Motion to Dismiss for Failure to State a Claim](#) [Fri 10/28 9:43 AM](#)

ORDER denying Defendant's23 Motion to Dismiss or to Strike. Signed by Judge Ricardo S. Martinez. (SB) (cc: Raymond Mercado via USPS)

Tuesday, October 18, 2022


34 ☆  [notice](#) [Notice of Compliance](#) [Tue 10/18 3:48 PM](#)

NOTICE of Compliance re33 Order on Motion to Withdraw as Attorney,, Add and Terminate Attorneys,, by Defendant Landmark Technology A LLC.(Newman, Derek)

Att: 1  Exhibit A,


Att: 2  Exhibit B

Friday, October 14, 2022


33 ☆  [2 pgs](#) [order](#) [Order on Motion to Withdraw as Attorney ~Util - Add and Terminate Attorneys](#) [Fri 10/14 9:14 AM](#)

ORDER granting Defendant's Counsel's29 Motion to Withdraw as Attorney. Defendant is currently without counsel and must have new counsel enter an appearance no later than 30 days from the date of this Order. Signed by Judge Ricardo S. Martinez. (SB)


Monday, May 09, 2022

32 ☆  [respm](#) [Declaration](#) [Mon 05/09 3:03 PM](#)


DECLARATION of Aaron J. Fickes filed by Plaintiff State of Washington re29 MOTION to Withdraw as Attorney (Fickes, Aaron)

31 ☆  [respm](#) [Response to Motion](#) [Mon 05/09 3:02 PM](#)


RESPONSE, by Plaintiff State of Washington, to29 MOTION to Withdraw as Attorney . (Fickes, Aaron)

Friday, April 29, 2022**Thursday, April 28, 2022**29 ☆  **motion** **Withdraw as Attorney** **Thu 04/28 4:03 PM**


MOTION to Withdraw as Attorney , filed by Defendant Landmark Technology A LLC. Noting Date 5/13/2022, (Newman, Derek)

Att: 1  Declaration of Derek A. Newman in Support of Newman Du Wors LLP's Motion to Withdraw as Counsel**Friday, April 08, 2022**28 ☆  **respm** **Reply to Response to Motion** **Fri 04/08 11:38 AM**


REPLY, filed by Defendant Landmark Technology A LLC, TO RESPONSE to23 MOTION to Dismiss for Failure to State a Claim Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f) (Newman, Derek)

Friday, March 25, 202227 ☆  **misc** **Response (non motion)** **Fri 03/25 4:23 PM**


RESPONSE by Plaintiff State of Washington to Defendant's Request for Judicial Notice (Fickes, Aaron)

26 ☆  **respm** **Response to Motion** **Fri 03/25 4:01 PM**









RESPONSE, by Plaintiff State of Washington, to23 MOTION to Dismiss for Failure to State a Claim Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f) . Oral Argument Requested. (Fickes, Aaron)

Wednesday, March 16, 202225 ☆  **misc** **Praecipe-Other** **Wed 03/16 11:47 AM**


PRAECIPE re23 MOTION to Dismiss for Failure to State a Claim Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f) by Defendant Landmark Technology A LLC(Linke, Derek)

Att: 1  Defendant Landmark Technology A, LLC's Corrected Motion to Dismiss Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f)**Friday, March 04, 2022**24 ☆  **misc** **Request** **Fri 03/04 6:43 PM**

REQUEST by Defendant Landmark Technology A LLC for Judicial Notice re23 MOTION to Dismiss for Failure to State a Claim Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f)(Linke, Derek)


Att: 1   **11 pgs** Att. A - U.S. Patent No. 7,010,508,Att: 2  Att. B - '508 Patent Prosecution Transaction History,Att: 3  Att. C - May 20, 2014 Decision Instituting CBM Review,Att: 4  Att. D - August 29, 2014 Patent Owner's Response to CBM Review,Att: 5  Att. E - August 15, 2014 Expert Declaration in CBM,Att: 6  Att. F - October 14, 2014 Order Terminating CBM Review,Att: 7  Att. G - February 20, 2013 Reexamination Office Action,Att: 8  Att. H - July 31, 2013 Reexamination Office Action,Att: 9  Att. I - July 11, 2014 Reexamination Examiner's Answer in Appeal,Att: 10  Att. J - June 29, 2017 Ex Parte Reexamination Certificate,Att: 11  Att. K - Patent Troll Prevention Act Legislative History23 ☆  **motion** **Dismiss for Failure to State a Claim** **Fri 03/04 6:31 PM**


MOTION to Dismiss for Failure to State a Claim Under Rule 12(b)(6) or, in the Alternative, to Strike Under Rule 12(f) , filed by Defendant Landmark Technology A LLC. Oral Argument Requested. Noting Date 4/8/2022, (Linke, Derek)

Monday, February 07, 202222 ☆  **4 pgs** **order** **Order on Stipulated Motion ~Util - Set/Reset Deadlines/Hearings** **Mon 02/07 4:46 PM**

ORDER re Parties'21 Stipulated MOTION Setting Motion Briefing Schedule and Answer Deadline. Landmark shall file its motion to dismiss and any supporting material not later than 3/4/2022. The State's opposition and any supporting materials shall be filed on or before 3/25/2022. Landmark's reply and any supporting materials shall be filed by 4/8/2022. Landmark shall file its answer, if necessary 21 days after the Court issues its ruling on Landmark's motion to dismiss. Signed by Judge Ricardo S. Martinez. (SB)

Wednesday, February 02, 2022


21 ☆  **motion** **Stipulated Motion** **Wed 02/02 12:01 PM**
Stipulated Stipulated MOTION Setting Motion Briefing Schedule and Answer Deadline , filed by Plaintiff State of Washington. Noting Date 2/2/2022, (Fickes, Aaron)

20 ☆  **misc** **Notice to Withdraw Pending Motion** **Wed 02/02 11:54 AM**
NOTICE to Withdraw Pending Motion re5 MOTION to Remand ; by Plaintiff State of Washington. (Fickes, Aaron)

Thursday, January 13, 2022

utility **Add and Terminate Judges** **Thu 01/13 10:13 AM**
Case Reassigned back to Judge Ricardo S. Martinez. Judge Tana Lin no longer assigned to case. (KMP)


Friday, January 07, 2022


19 ☆  **order** **TL Order re 28 USC 455 (FORM)** **Fri 01/07 1:37 PM**
STANDING ORDER REGARDING 28 U.S.C. § 455 AND CANON 3 OF THE CODE OF CONDUCT FOR UNITED STATES JUDGES by Judge Tana Lin. (KMP)


Monday, December 13, 2021


utility **Case Assigned/Reassigned to Judge** **Mon 12/13 4:29 PM**
Case Reassigned to Judge Tana Lin. Judge Ricardo S. Martinez no longer assigned to the case. (LC)

Tuesday, November 23, 2021


18 ☆  **notice** **Notice of Appearance** **Tue 11/23 11:50 AM**
NOTICE of Appearance by attorney Ben Brysacz on behalf of Plaintiff State of Washington. (Brysacz, Ben)


17 ☆  **notice** **Notice of Appearance** **Tue 11/23 11:46 AM**
NOTICE of Appearance by attorney Heidi C Anderson on behalf of Plaintiff State of Washington. (Anderson, Heidi)

16 ☆  **notice** **Notice of Withdrawal of Counsel** **Tue 11/23 11:32 AM**
NOTICE OF WITHDRAWAL OF COUNSEL: Attorney Seann C Colgan for Plaintiff State of Washington. (Colgan, Seann)


15 ☆  **notice** **Notice of Appearance** **Tue 11/23 11:26 AM**
NOTICE of Appearance by attorney Aaron J. Fickes on behalf of Plaintiff State of Washington. (Fickes, Aaron)

Thursday, September 02, 2021

14 ☆  **notice** **Notice of Supplemental Authority** **Thu 09/02 7:35 AM**
NOTICE of Supplemental Authority by Defendant Landmark Technology A LLC(Newman, Derek)

Att: 1  Exhibit A - Order Denying Remand

Wednesday, September 01, 2021


13 ☆  **notice** **Notice of Supplemental Authority** **Wed 09/01 10:35 AM**
NOTICE of Supplemental Authority by Plaintiff State of Washington(Colgan, Seann)

Att: 1  Exhibit Exhibit A - Order Remanding


Tuesday, July 06, 2021

12 ☆  **respm** **Surreply** **Tue 07/06 4:48 PM**
SURREPLY filed by Defendant Landmark Technology A LLC re5 MOTION to Remand (Newman, Derek)



Monday, July 05, 2021

11 ☆  **notice** **Notice-Other** **Mon 07/05 1:20 PM**
NOTICE of intent to file surreply re5 MOTION to Remand ; filed by Defendant Landmark Technology A LLC. (Sykes, Jason)

Friday, July 02, 2021

10 ☆  **respm** **Reply to Response to Motion** **Fri 07/02 4:04 PM**
REPLY, filed by Plaintiff State of Washington, TO RESPONSE to5 MOTION to Remand (Colgan, Seann)



Monday, June 28, 2021

9   **respm** **Declaration** **Mon 06/28 7:14 PM**

DECLARATION of Jason B. Sykes filed by Defendant Landmark Technology A LLC re5 MOTION to Remand(Newman, Derek)

Att: 1  Exhibit A,



Att: 2  Exhibit B

8   **respm** **Response to Motion** **Mon 06/28 7:12 PM**

RESPONSE, by Defendant Landmark Technology A LLC, to5 MOTION to Remand . Oral Argument Requested.(Newman, Derek)



Att: 1  Proposed Order

Tuesday, June 22, 2021

7   **2 pgs** **order** **Order on Stipulated Motion ~Util - Case Stayed ~Util - Terminate Deadlines/Hearings** **Tue 06/22 3:39 PM**



ORDER granting the parties'6 Stipulated Motion to Stay Proceedings Pending Motion to Remand. All proceedings in this case, except with respect to the States Motion to Remand (Dkt. No.5), are temporarily stayed until the Court enters an order on the Motion to Remand. All pending deadlines, except for those directly related to the Motion to Remand, are stricken. Signed by Judge Ricardo S. Martinez. (PM)

Friday, June 18, 2021


6   **motion** **Stipulated Motion** **Fri 06/18 10:41 AM**

Stipulated MOTION and [Proposed] Order to Stay Proceedings Pending Motion to Remand , filed by Defendant Landmark Technology A LLC. Noting Date 6/18/2021, (Newman, Derek)



Thursday, June 10, 2021

5   **motion** **Remand** **Thu 06/10 5:56 PM**

MOTION to Remand , filed by Plaintiff State of Washington. Noting Date 7/2/2021, (Colgan, Seann)



Att: 1  Proposed Order REMANDING TO KING COUNTY SUPERIOR COURT AND AWARDING STATE ITS COSTS AND FEES

Tuesday, June 08, 2021



4   **order** **Joint Status Report Order Form for District Judges** **Tue 06/08 10:23 AM**

ORDER REGARDING INITIAL DISCLOSURES AND JOINT STATUS REPORT by Judge Ricardo S. Martinez. Joint Status Report due by 7/20/2021, FRCP 26(f) Conference Deadline is 7/6/2021, Initial Disclosure Deadline is 7/13/2021. (LC)

Thursday, June 03, 2021

3   **utility** **Judge Assignment Letter (Removal & Transfer cases only)** **Thu 06/03 4:22 PM**



LETTER from Clerk re receipt of case from King County Superior Court and advising of WAWD case number and judge assignment. (RE)

2   **discov** **Corporate Disclosure Statement** **Thu 06/03 2:17 PM**



CORPORATE DISCLOSURE STATEMENT indicating no Corporate Parents and/or Affiliates. Filed pursuant to Fed.R.Civ.P 7.1. Filed by Landmark Technology A LLC (Linke, Derek)

utility **Add and Terminate Judges** **Thu 06/03 4:12 PM**
Judge Ricardo S. Martinez added. (RE)

Wednesday, June 02, 2021

1   **cmp** **Notice of Removal** **Wed 06/02 4:30 PM**

NOTICE OF REMOVAL from King County Superior Court, case number 21 2-06348 5; Related [+] Attorney Derek Alan Newman added to party Landmark Technology A LLC(pty:dft), filed by Landmark Technology A LLC.(Newman, Derek)

Att: 1   **33 pgs** Complaint,

Att: 2  Exhibit,

Att: 3  Civil Cover Sheet

Showing

All



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