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6 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

7 NAME,

8 Plaintiff,

Case No.

9 v.

**AGREEMENT FOR  
INDIVIDUALIZED TRIAL AND  
REQUEST FOR APPROVAL**

10 NAME,

11 Defendant.

12 The parties agree that all litigation in the above captioned matter shall be governed by  
13 Local Civil Rule 39.2, “the Individualized Trial Procedure,” unless otherwise ordered by the  
14 court. This agreement, when approved by the court, shall be binding on the parties.

15 In addition to the terms set forth in Local Civil Rule 39.2, the parties elect and agree to  
16 the following:

17 1. The judge may order equitable relief consistent with and within the options agreed to by the  
18 parties, *e.g.*, injunctive relief, promises to implement policies or practices, etc.

19 2. The parties agree to further reduce the scope of the litigation and the trial in the following  
20 ways (*e.g.*, to forego pretrial motions, such as motions to dismiss, motions for summary  
21 judgments, etc., in exchange for limitations on damages, including waiver of punitive damages):  
22 \_\_\_\_\_.

23 3. The pretrial conference and pretrial order obligations in LCR 16 will be reduced or amended  
as follows: \_\_\_\_\_.

1 4. Other: \_\_\_\_\_.

2 The parties agree that any and all rights to appeal from any judgment in this matter are  
3 waived by all parties, except as provided in LCR 39.2.

4 DATED: \_\_\_\_\_, 20\_\_.

5 By: */s/ Name* \_\_\_\_\_  
6 NAME

By: */s/ Name* \_\_\_\_\_  
NAME

7 ATTORNEYS FOR PLAINTIFF

ATTORNEYS FOR DEFENDANT

8 **IT IS ORDERED** that the forgoing agreement is approved. The Court will issue an  
9 individualized trial schedule consistent with this order.

10  
11 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

12  
13 \_\_\_\_\_  
14 NAME  
15 United States District Judge  
[or United States Magistrate Judge]