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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

FARMERS INSURANCE COMPANY OF
WASHINGTON, as subrogee for Trevor and
Andrea Nipges, and Trevor and Andrea Nipges,
a marital community,

Plaintiffs,

vs.

POLARIS INDUSTRIES, INC., a Minnesota
corporation,

Defendants.

No. 2:07-cv-02049-RSM

**STIPULATED MOTION TO EXTEND
DISCOVERY AND DISPOSITIVE
MOTION DEADLINES**

Defendant Polaris Industries Inc. ("Polaris"), Plaintiff Farmers Insurance Company of
Washington ("Farmers"), and Plaintiff's Trevor and Andreas Nipges ("Nipges") stipulate and
move the Court as follows:

1. This case was originally filed with Farmers as the only plaintiff.
2. On September 24, 2008, Farmers and Polaris stipulated, and this Court ordered, to
allow Nipges to intervene in the action and the case schedule was amended. The amendment
moved the discovery and dispositive motion deadlines from November 17, 2008 to March 16,

Stipulated Motion and Order re: Discovery and
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1 2009.

2 3. The parties have tentatively scheduled mediation for April 22, 2009. To minimize
3 travel of Polaris' counsel, and possibly a representative for the mediation, the depositions of
4 experts are being scheduled for April 21, 2009.

5 5. The ADR deadline is April 30, 2009. A jury trial is set for June 22, 2009.

6 6. Additional travel considerations have resulted in depositions being planned in Phoenix
7 and Minnesota (possibly by video) on March 23 and April 1, 2009, respectively.

8 7. The parties are cooperating in this matter; discovery is anticipated to be completed by
9 the current discovery cut-off date with the exception of the depositions noted.

10 8. Accordingly, the parties move the Court to continue the discovery deadline from
11 March 16, 2009 to April 22, 2009, and the dispositive motion deadline from March 16, 2009 to
12 May 6, 2009.

13 Respectfully submitted this 11th day of March, 2009.

14 EVEZICH LAW OFFICES, P.L.L.C.

15 BOWMAN AND BROOKE LLP

16
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19 Attorney for Plaintiff Farmers

20 By s/ Ryan L. Nilsen
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23 Industries Inc.

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27 Stipulated Motion and Order re: Discovery and
28 Dispositive Motion Deadlines

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1 **ORDER**

2 THIS MATTER having come before the Court on the above stipulated motion of the
3 parties, the Court finds good cause to extend the discovery and dispositive motion deadlines.
4 However, the parties' proposed extensions would provide the Court insufficient time to address
5 any dispositive motions before the June 22, 2009, trial date. Accordingly, IT IS HEREBY
6 ORDERED that the following case deadlines shall be continued as follows:

- 7
- 8 1. The discovery deadline, currently set for March 16, 2009, is continued to **April 1,**
9 **2009.**
 - 10 2. The dispositive motion deadline, currently set for March 16, 2009, is continued to
11 **April 1, 2009.**

12 All other deadlines shall remain the same. If the parties require additional time to
13 complete discovery, the Court will consider a stipulation to a short continuance of the trial date.

14 Dated this 16th day of March, 2009

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18 Honorable John C. Coughenour
19 United States District Court Judge

20 Presented by:

21 BOWMAN AND BROOKE LLP

22 By s/ Ryan L. Nilsen _____
23 Ryan L. Nilsen, *pro hac vice*
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26 Stipulated Motion and Order re: Discovery and
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