

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JON ZAMELIS, an individual,

Plaintiff,

vs.

WINGFOOT COMMERCIAL TIRE  
SYSTEMS, LLC, a Washington Limited  
Liability Company,

Defendant.

No. C08-1588 RSM

**STIPULATED ORDER TO FILE AMENDED  
ANSWER AND COUNTERCLAIM AND  
ISSUE NEW SCHEDULING ORDER**

**RELIEF REQUESTED**

The parties, Plaintiff Jon Zamelis and Defendant Wingfoot Commercial Tire Systems, LLC, have hereby stipulated and agreed to allow Defendant to file its Amended Answer and Counterclaim pursuant to Rule 15(a)(2). Consequently, the parties respectfully request that this Court (1) extend the dates contained in the Court's Order Setting Trial and Related Dates, including the reports from expert witnesses which are currently due on May 1, 2009, and (2) issue a new Order Regarding Initial Disclosures, Joint Status Report, And Early Settlement.

The parties make this request because Defendant plans to file an Amended Answer and Counterclaim sometime the week of May 4, 2009, after which the parties have agreed that they will request a new Scheduling Order from the Court. Consequently, the parties will not be ready to file their expert witness reports on May 1, 2009.

**STIPULATED ORDER TO FILE AMENDED ANSWER AND  
COUNTERCLAIM AND ISSUE NEW SCHEDULING ORDER- 1  
CASE NO. C08-1588 RSM**

LITTLER MENDELSON P.C.  
One Union Square  
600 University Street, Suite 3200  
Seattle, WA 98101.3122  
206.623.3300

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Dated: April 30, 2009

/s/Joanna M. Silverstein  
Leigh Ann Tift, WSBA #11776  
ltift@littler.com  
Joanna M. Silverstein, WSBA #38577  
jsilverstein@littler.com  
LITTLER MENDELSON  
A Professional Corporation  
One Union Square  
600 University Street, Suite 3200  
Seattle, WA 98101.3122  
Phone: 206.623.3300  
Fax: 206.447.6965

Attorneys for Defendant  
WINGFOOT COMMERCIAL TIRE  
SYSTEMS, LLC

Dated: April 30, 2009

/s/Jeffrey C. Wishko  
Jeffrey C. Wishko, WSBA #12885  
jwishko@bellingham.com  
Bell & Ingram, P.S.  
2918 Colby Avenue, Suite 201  
Everett, Washington 98201  
Tel: (206) 762-3623  
Fax: (425) 339-8450

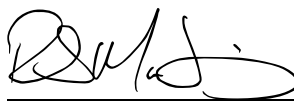
Attorneys for Plaintiff  
JON ZAMELIS

1 **ORDER**

2 Based on the foregoing Stipulation, it is hereby ORDERED, ADJUDGED AND  
3 DECREED as follows:

4 The stipulated Motion to Extend Trial and Related Dates is GRANTED. The clerk will  
5 issue a New Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement.

6 DATED: May 4, 2009

7  
8 

9 **RICARDO S. MARTINEZ**  
10 **UNITED STATES DISTRICT JUDGE**

11 **PRESENTED BY:**

12 /s/Joanna M. Silverstein  
13 Leigh Ann Tift, WSBA #11776  
14 [ltift@littler.com](mailto:ltift@littler.com)  
15 Joanna M. Silverstein, WSBA #38577  
16 [jsilverstein@littler.com](mailto:jsilverstein@littler.com)  
17 LITTLER MENDELSON  
18 A Professional Corporation  
19 One Union Square  
20 600 University Street, Suite 3200  
21 Seattle, WA 98101.3122  
22 Phone: 206.623.3300  
23 Fax: 206.447.6965  
24 *Attorneys for Defendant*

19 /s/Jeffrey C. Wishko  
20 Jeffrey C. Wishko, WSBA #12885  
21 [jwishko@bellingram.com](mailto:jwishko@bellingram.com)  
22 Bell & Ingram, P.S.  
23 2918 Colby Avenue, Suite 201  
24 Everett, Washington 98201  
25 Tel: (206) 762-3623  
26 Fax: (425) 339-8450  
*Attorneys for Plaintiff*