



11-CV-01119-ORD

HON. ROBERT S. LASNIK

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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Z.D., by and through her parents and guardians, J.D. and T.D., individually, on behalf of THE TECHNOLOGY ACCESS FOUNDATION HEALTH BENEFIT PLAN, and on behalf of similarly situated individuals,

Plaintiffs,

v.

GROUP HEALTH COOPERATIVE; GROUP HEALTH OPTIONS, INC.; and THE TECHNOLOGY ACCESS FOUNDATION HEALTH BENEFIT PLAN,

Defendants.

NO. 2:11-CV-01119

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING EXPERT REPORTS

NOTED FOR CONSIDERATION:
April 3, 2012

I. STIPULATION

Pursuant to this Court's Scheduling Order, the expert report deadline is April 4, 2012. See Minute Order Setting Trial Date & Related Dates (Dkt. #27), p. 1. The deadline, however, may be extended by the court "for good cause." *Id.*, p. 2. Here, the parties agree the disclosure of the expert reports should be continued until additional discovery has occurred, specifically the production of certain utilization and cost data from Group Health that has been requested by plaintiff. The parties agree that mechanics of collecting this material is difficult, but that Group Health has been

1 making diligent efforts to collect the material requested. Moving the disclosure date
2 will permit the parties to continue to work through the production of this material
3 without placing an undue burden on Group Health. This stipulation does not seek to
4 alter any other dates in the Scheduling Order.

5 As a result, the parties, through undersigned counsel, stipulate and agree
6 that the disclosure date for expert reports may, subject to court approval, be moved to
7 May 14, 2012.

8 DATED: April 3, 2012.

9 SIRIANNI YOUTZ SPOONEMORE

10 DAVIS WRIGHT TREMAINE, LLC

11 /s/ Richard E. Spoonemore

11 /s/ Charles S. Wright (per email authorization 4/3/12)

12 Richard E. Spoonemore (WSBA #21833)

12 Charles S. Wright (WSBA #31940)

13 Eleanor Hamburger (WSBA # 26478)

13 Nigel P. Avilez (WSBA #36699)

14 Attorneys for Plaintiff

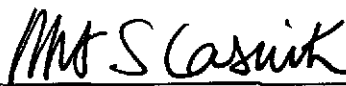
14 Rebecca Francis (WSBA #41196)

15 Attorneys for Defendants

16 **II. ORDER**

17 Pursuant to the stipulation of the parties, and for good cause shown, the
18 deadline for the disclosure of expert reports shall be continued to May 14, 2012. This
19 Order does not preclude either party from seeking a further extension of the deadline if
20 good cause can be show for such a request. IT IS SO ORDERED.

21 DATED this 4th day of April, 2012.

22 

23 ROBERT S. LASNIK
24 United States District Judge