1		The Honorable Mary Alice Theiler
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8	UNITED STATES DISTRICT COURT	
9	WESTERN DISTRICT OF WASHINGTON	
10	AT SEATTLE	
11	ROBERT KOCHENDORFER,	) Case No. C11 – 1162-MAT
12	Plaintiff,	) JOINT MOTION TO EXTEND EXPERT ) DISCLOSURE DEADLINE
13	VS.	) Clerk's Action Required
14	METROPOLITAN PROPERTY & CASUALTY INSURANCE COMPANY,	) NOTE ON MOTION CALENDAR: February
15 16	Defendant.	) 27, 2012 ) )
17	COME NOW Defendant Metropolit	an Property & Casualty Insurance Company and
18	Plaintiff Robert Kochendorfer jointly move the	ne Court as follows.
19	I. S	TIPULATION
20	Plaintiff Kochendorfer and Defendant	Metropolitan hereby stipulate and agree as follows:
21	Reports of Expert Witnesses are	currently due in this matter on March 6, 2012.
22	2. The parties have discussed the	current expert disclosure deadline, and outstanding
23	discovery, and have agreed to ex	stend disclosure of the expert reports.
24	3. There are depositions necessary	to expert reports, and the parties have been unable
25	to find a mutually agreeable da	te for the depositions to take place, that will allow
26	enough time for the experts to p	repare the necessary reports.
	JOINT MOTION TO EXTEND EXPERT DISCLOSU (W. D. Wash. Cause No. CV11-1162 MAT) – Page 1	URE DEADLINE 1 I 622

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1	4. The parties have agreed that the expert report disclosure deadline be moved to April
2	8, 2012.
3	5. No other deadlines in this matter will be changed.
4	DATED this 2 <sup>nd</sup> day of March 2012.
5	THENELL LAW GROUP, P.C.
6	
7	By: /s/ Jillian M. Hinman Daniel E. Thenell, WSBA No. 37297
8	Email: dan@thenelllawgroup.com Jillian M. Hinman, WSBA No. 40665
9	E-mail: jillian@thenelllawgroup.com Telephone: (503) 892-3936 Substituting Attorneys for Defendant
11	Metropolitan Property & Casualty Insurance Company
12	
13	COLE WATHEN LEID & HALL
14	Dry /a/Diak I Wathan *
15	By: /s/ Rick J. Wathen * Rick J. Wathen, WSBA No. 25539 E-mail: rwathen@cwlhlaw.com
16	Telephone: (206) 622-0494 Attorneys for Plaintiff
17	Robert R. Kochendorfer
18	* pursuant to email authorization
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20	II. ORDER ON JOINT MOTION
21	Pursuant to the above Stipulation of the parties, the Court approves the Joint Motion and
22	orders as follows:
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	JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE

1	1. The Expert Report deadline shall be April 8, 2012, in this matter.	
2	SO ORDERED this 5th day of March, 2012.	
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4	Mary Alice Theiler	
5	United States Magistrate Judge	
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7	Presented by:	
8	THENELL LAW GROUP, P.C.	
9		
10	By:/s/ Jillian M. Hinman	
11	Daniel E. Thenell, WSBA No. 37297 Email: dan@thenelllawgroup.com	
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14	Metropolitan Property & Casualty Insurance Company	
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16	COLE WATHEN LEID & HALL	
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18	By: /s/ Rick J. Wathen * Rick J. Wathen, WSBA No. 25539	
19	E-mail: <u>rwathen@cwlhlaw.com</u> Telephone: (206) 622-0494	
20	Attorneys for Plaintiff Robert R. Kochendorfer	
21	* pursuant to telephone authorization	
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