

HON. ROBERT S. LASNIK

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

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GARY REMING and PATRICIA REMING

Plaintiffs,

v.

HOLLAND AMERICA LINE INC., a  
Washington corporation; HOLLAND  
AMERICA LINE N.V., a foreign corporation;  
HAL ANTILLEN N.V., a foreign corporation;  
and HAL NEDERLAND N.V., a foreign  
corporation;

Defendants.

NO. 2:11-cv-1609 RSL

JOINT MOTION AND ORDER EXTENDING  
THE DEADLINE TO PROVIDE REPORTS  
FROM EXPERT WITNESSES

**NOTED ON MOTION CALENDAR:  
August 7, 2012**

This is a maritime action arising out of injuries sustained by Plaintiff Gary Reming on  
November 30, 2010 while he and his wife Patricia were attending a shore excursion in Mazatlan,  
Mexico as part of a Holland America Line cruise.

JOINT MOTION & ORDER EXTENDING THE DEADLINE  
TO PROVIDE REPORTS FROM EXPERT WITNESSES  
CASE NO.: 2:11-cv-1609 RSL - 1

**LAW OFFICES OF  
JAMES S. ROGERS**  
1500 Fourth Avenue, Site. 500  
Seattle, WA 98101  
(206) 621-8525 Phone  
(206) 223-8224 Fax

1 The current deadline to provide reports from expert witnesses in this matter is August 8,  
2 2012. The parties have conferred and agreed that an extension of the deadline to provide reports  
3 from expert witnesses in this matter would be appropriate and is likely necessary in order to  
4 provide meaningful expert disclosures.

5 Discovery in this case has been complicated by the fact that witnesses are in Mexico, and  
6 additional depositions need to be taken. In addition, service of process has not yet been made  
7 upon Tropical Tours under the Hague Convention due to unexpected difficulties posed by  
8 service in Mexico as previously explained to the Court. (*See* Amended Motion for Appointment  
9 of Special Process Server, Dkt. No. 47.) Furthermore, Plaintiff and the Holland America parties  
10 will be mediating this matter on September 19, 2012, and as such, the parties believe expert  
11 disclosures after mediation rather than before, would preserve resources and allow the parties to  
12 focus on resolution of this matter. By and through their respective counsel, the parties therefore  
13 respectfully request that the court extend the deadline to provide reports from expert witnesses  
14 by forty-five days, or from August 8, 2012, until September 24, 2012.

15  
16 Dated: August 7, 2012

LAW OFFICES OF JAMES S. ROGERS

17  
18 s/James S. Rogers

s/Dana A. Henderson

JAMES S. ROGERS, WSBA #5335

DANA A. HENDERSON, WSBA#32507

1500 Fourth Avenue, Suite 500

Seattle, WA 98101

Phone: 206-621-8525

Attorneys for Plaintiffs

CADENA CHURCHILL, LLP

s/Raul Cadena

s/Gordon S. Churchill

GORDON S. CHURCHILL, Pro Hac Vice  
RAUL CADENA, Pro Hac Vice  
701 "B" Street, Suite 1400  
San Diego, CA 92101  
Phone: 619-546-0888  
Attorneys for Plaintiffs

Dated: August 7, 2012

NIELSEN SHIELDS, PLLC

s/Louis A. Shields

LOUIS A. SHIELDS, WSBA #25740  
600 Stewart Street Ste. 1703  
Seattle, WA 98191  
Phone: 206-728-1300  
Attorneys for Defendants

**ORDER**

THIS MATTER having come before the undersigned Judge based upon the parties' foregoing stipulation and the Court having reviewed the files and records herein and deeming itself fully advised, NOW THEREFORE, it is hereby ORDERED:

1. The Court will extend the deadline for providing reports from expert witnesses from August 8, 2012 to September 24, 2012 in the instant litigation.

DATED this 13<sup>th</sup> day of August, 2012.



Robert S. Lasnik  
United States District Judge

LAW OFFICES OF  
JAMES S. ROGERS  
1500 Fourth Avenue, Site. 500  
Seattle, WA 98101  
(206) 621-8525 Phone  
(206) 223-8224 Fax

1 PRESENTED BY:

2  
3 s/ James S. Rogers  
4 s/Dana A. Henderson  
5 Law Offices of James S. Rogers  
6 James S. Rogers, WSBA #5335  
7 Dana A. Henderson, WSBA # 32507  
8 Attorneys for Plaintiffs

9  
10  
11 CADENA CHURCHILL, LLP

12 s/Raul Cadena  
13 s/Gordon S. Churchill  
14 GORDON S. CHURCHILL, Pro Hac Vice  
15 RAUL CADENA, Pro Hac Vice  
16 701 "B" Street, Suite 1400  
17 San Diego, CA 92101  
18 Phone: 619-546-0888  
19 Attorneys for Plaintiffs

20  
21  
22 Approved as to Form and Content:

23  
24  
25 NIELSEN SHIELDS, PLLC

26 s/Louis A. Shields  
LOUIS A. SHIELDS, WSBA #25740  
600 Stewart Street Ste. 1703  
Seattle, WA 98191  
Phone: 206-728-1300  
Attorneys for Defendants