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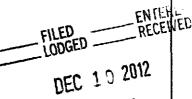
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THE HONORABLE ROBERT S. LASNIK

11-CV-01951-ANS



AT SEATTLE
COURT
OF THE COURT
OF THE COURT
OF THE COURT
WESTERN DISTRICT ( WASHING WASHING)

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

RANDY ALLEN JONES and RITA JONES, husband and wife, and the marital community composed thereof,

Plaintiffs,

VS.

BP WEST COAST PRODUCTS, LLC,

Defendant.

NO. 2:11-cv-01951 RSL

STIPULATION AND ORDER TO EXTEND DATES

## **STIPULATION**

The parties have scheduled a mediation of this case for January 25, 2013, and hereby stipulate to the following amendment pretrial due dates set in the Minute Order Setting Trial Date & Related Dates entered February 14, 2012. No change of the trial date of May 6, 2013 is requested. The plaintiff's medical treatment continues. The parties request that the court enter the attached order making the following changes:

1) Reports from Expert Witnesses under FRCP 26(a)(2):

STIPULATION AND ORDER TO EXTEND DATES - 1

ŁAW OFFICE OF WILLIAM J. O'BRIEN 800 FIFTH AVENUE, SUITE 3810 SEATTLE, WA 98104-3176 TELEPHONE (206) 515-4800/FAX (206) 515-4848

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1	CURRENTLY DUE: (per stipulation filed on October 10, 20	December 17, 2012 2012)	
2	AGREED EXTENSION DATE	February 25, 2013.	
4	2) Discovery completed:		
5	CURRENTLY:	January 6, 2013	
6	REQUESTED EXTENSION DATE	February 11, 2013	
7' 8	3) The parties realize that the limitation to th	hree discovery depositions per party will not	
9	be sufficient, and ask that the court provide for a change to paragraph 5.d of the Proposed Discovery Plan in the Joint Status Report & Discovery Plan to allow each party to conduct 10 discovery depositions, to include experts and/or health care providers.		
10			
11			
12	Agreed to and Notice of Presentation Waived	d:	
13	DATED this 14th day of December, 2	2012.	
14			
15 16	LAW OFFICE OF WILLIAM J. O'BRIEN	ROBINSON & KOLE	
17	/s/ William J. O'Brien By:	/s/ Matthew J. Daheim with Authority By:	
18	William J. O'Brien, WSBA No. 5907 800 Fifth Avenue, Suite 3810	David W. Robinson, WSBA No. 3780 Matthew J. Daheim, WSBA No. 30555	
19	Seattle, WA 98104-3176 Email: william.obrien@zurichna.com	911 Dupont Street Bellingham, WA 98225	
20	Ph: 206-515-4800 / Fax: 206-515-4848 Attorneys for BP West Coast Products	Email: mattd@robinsonandkole.com Ph: 360-671-8112 / Fax: 360-671-1971	
21	•	Attorneys for Plaintiffs Randy and Rita Jones	
22			
24			
25			
	STIPULATION AND ORDER TO EXTEND DATES -	- 2 LAW OFFICE OF WILLIAM J. O'BRIEN 800 FIFTH AVENUE, SUITE 3810	

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1	GRAHAM & DUNN	
2	/s/ K. Michael Fandel with Authority	
3	By: K. Michael Fandel, WSBA No. 16281	
4	Aimee K. Decker, WSBA 41797 Pier 70, 2801 Alaskan Way, Suite 300	
5	Seattle, WA 98121 Email: mfandel@grahamdunn.com	
6	Email: adecker@grahamdunn.com	
7	Ph: 206-624-8300 / Fax: 206-340-9599 Attorneys for BP West Coast Products	
8		
9	ORDER	
10	Based on the foregoing Stipulation, it is hereby	
11	ORDERED that the deadline to disclose expert reports is extended from	
12	December 17, 2012 to February 25, 2013, and the discovery cutoff date is extended from	
13		
14	January 6, 2013 to February 11, 2013.	
15	FURTHER ORDERED that the parties request to increase the number of	
16	discovery depositions that may be taken by each party from three (3) to ten (10)	
17	depositions is GRANTED.	
18	DATED this 18 day of December, 2012.	
19		
20	MW Clark	
21	HONORABLE ROBERT S, LASNIK	
22	United States District Court Judge	
23		
24		
25		
	STIPHLATION AND ORDER TO EXTEND DATES 2	

800 FIFTH AVENUE, SUITE 3810 SEATTLE, WA 98104-3176 TELEPHONE (206) 515-4800/FAX (206) 515-4848