1		THE HONORABLE MARSHA J. PECHMAN	
2			
3			
4			
5			
6			
7	UNITED STATES DISTRICT COURT		
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
9			
10	CINDY IMESON,	No. 2:13-cv-00468-MJP	
11	Plaintiff,	STIPULATED MOTION AND ORDER TO EXTEND DEADLINE FOR	
12	v.	DEFENDANT TO SERVE PRETRIAL	
13	EAGLE VIEW TECHNOLOGIES, INC. and DOES 1-5 inclusive,	STATEMENT	
14	Defendants.	NOTE ON MOTION CALENDAR: April 4, 2014	
15		1	
16	1. Pursuant to the Order Setting Trial Date & Related Dates entered by this Court		
17	on May 30, 2013 ("May 30, 2013 Order"), the agreed pretrial order is due on April 30, 2014.		
18	Dkt. No. 10.		
19	2. Pursuant to the May 30, 20	13 Order and LCR 16(h), plaintiff's deadline to	
20	serve her pretrial statement on defendant Eagle View Technologies, Inc. is March 31, 2014.		
21	3. Plaintiff has not yet served her pretrial statement as of the date of this motion.		
22	Declaration of Nicole Tadano in Support of Stipulated Motion to Extend Deadline to Serve		
23	Pretrial Statement ("Tadano Decl.") ¶ 2.		
24	4. Pursuant to the May 30, 2013 Order and LCR 16(i), defendant Eagle View's		
25	pretrial statement is due April 10, 2014. Eagle View is required to make objections, additions,		
26	or changes to portions of plaintiff's pretrial s	statement; identify witnesses not already identified	
	STIPULATED MOTION TO EXTEND DEADLINE SERVE PRETRIAL STATEMENT - 1 2:13-cv-00468-MJP	TO DLA Piper LLP (US) 701 Fifth Avenue, Suite 7000 Seattle, WA 98104-7044 Tel: 206.839.4800	

1	by plaintiff; list exhibits not already listed by plaintiff; and otherwise respond to plaintiff's		
2	pretrial statement within the 10 days allotted to Eagle View under LCR 16.		
3	5. The Court may, for good cause, extend the time with motion if a request is made		
4	before the original time expires.		
5	6. The parties' counsel have confe	rred, and plaintiff's counsel has agreed to serve	
6	plaintiff's pretrial statement as soon as practicable, which plaintiff's counsel asserts is April 7,		
7	2014. Tadano Decl. ¶ 3.		
8	7. The parties stipulate and respectfully request that the Court grant this motion		
9	and extend the deadline for Eagle View to serve its pretrial statement to April 17, 2014.		
10	Respectfully submitted this 4th day of April, 2014.		
11	PREMIER LAW GROUP, PLLC	DLA PIPER LLP (US)	
12			
13	<u>s/ Ada Wong (with permission)</u>	<i>s/ Nicole M. Tadano</i> Nicole M. Tadano, WSBA No. 40531	
14	Ada K. Wong, WSBA No. 45936 3380 146th Place SE, Suite 430	701 Fifth Avenue, Suite 7000 Seattle, WA 98104	
15	Bellevue, WA 98007 Tel: (206) 285-1743	Tel: (206) 839-4800 / Fax: (206) 839-4801 Email: nicole.tadano@dlapiper.com	
16	Fax: (206) 599-6316 Email: ada@plg-pllc.com	Attorney for Defendant	
17	Attorney for Plaintiff Cindy Imeson	Eagle View Technologies, Inc.	
18			
19	ORDER		
20			
21	PURSUANT TO STIPULATION, IT	IS SO ORDERED.	
22	DATED: April 7, 2014		
23	1 /		
24		Marshuf Helens	
25		Marsha J. Pechman	
26		Chief United States District Judge	
	STIPULATED MOTION TO EXTEND DEADLINE TO SERVE PRETRIAL STATEMENT - 2 2:13-cv-00468-MJP	DLA Piper LLP (US) 701 Fifth Avenue, Suite 7000 Seattle, WA 98104-7044 Tel: 206.839.4800	

1	CERTIFICATE OF SERVICE		
2	I hereby certify that on April 4, 2014, I electronically filed the foregoing with the Clerk		
3	of the Court using the CM/ECF system which will send notification of such filing to all counsel		
4	of record:		
5	Andrew Ramiro Escobar		
6	andrew.escobar@dlapiper.com,karen.hansen@dlapiper.com		
7 8	• Darryl Parker dparker@plg–pllc.com,carrie@plg–pllc.com,smith@plg–pllc.com,ada@plg–pllc.com		
9	 Nicole M. Tadano nicole.tadano@dlapiper.com,patsy.howson@dlapiper.com Ada Ko Wong ada@plg-pllc.com,smith@plg-pllc.com,adakowong.esq@gmail.com,darryl@plg- pllc.com 		
10			
11			
12			
13	Dated this 4th day of April, 2014.		
14	s/ Nicole M. Tadano		
15	Nicole M. Tadano, WSBA No. 40531		
16			
17	WEST\247692912.1		
18			
19			
20			
21			
22			
23			
24			
25			
26			
	STIPULATED MOTION TO EXTEND DEADLINE TO SERVE PRETRIAL STATEMENT - 3 2:13-cv-00468-MJP DLA Piper LLP (US) 701 Fifth Avenue, Suite 7000 Seattle, WA 98104-7044 Tel: 206.839.4800		