

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERAL DEPOSIT INSURANCE  
CORPORATION as Receiver for Washington  
Mutual Bank,

Plaintiff,

v.

ARCH INSURANCE COMPANY,  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, and  
LLOYD'S SYNDICATE NOS. 2987, 2000  
and 382 and WUERTTEMBERGISCHE  
VERSICHERUNG A.G. 202388900007 as  
subscribers to the LLOYD'S POLICY and the  
COMPANIES INSURANCE POLICY NO.  
509/QA015607,

Defendants.

No. 2:14-cv-00545-RSL

**STIPULATED MOTION AND  
[PROPOSED] ORDER MODIFYING  
CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:  
Monday, January 23, 2017**

**STIPULATED MOTION**

The parties to this action, by and through their undersigned counsel, stipulate and jointly move to modify the pretrial deadlines highlighted in yellow below. The proposed modifications impact only dates by which the parties must complete their fact and expert discovery.<sup>1</sup> The proposed modification of these dates is requested by the parties' in light of

<sup>1</sup> The motion date set by LCR 7(d) or LCR 37(a)(2), which is keyed to the close of discovery, is also proposed to be modified because of the modification to the discovery completion date.

*Stipulation and Order Modifying Case Schedule -  
(2:14-cv-00545-RSL) - 1*

**HILLIS CLARK MARTIN & PETERSON P.S.**  
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1 their mutual desire to allow time for review of a substantial number of recently produced  
 2 documents and for all parties to complete document production to the greatest extent possible  
 3 prior to taking depositions of the many third party witnesses who are involved in the case,  
 4 some of whom are located overseas and all of whom, the parties believe, should only be  
 5 deposed once. To accommodate this desire, the parties propose to move back by  
 6 approximately one month each of the prior dates set by the Court for completion of fact and  
 7 expert discovery, as noted below. The modification of these deadlines shall not affect any  
 8 subsequent pretrial dates, including the prior court-ordered deadlines for conducting a  
 9 settlement conference, filing dispositive motions, submission of an agreed pretrial order,  
 10 pretrial conference, trial briefs and related documents, and the trial date.

Event	Date
The Parties disclose to each other the subject matter that each intended expert witness will address, either in their case in chief or on rebuttal	March 1, 2017
The Parties disclose to each other whether, in light of any opposing Parties' disclosure, they intend to offer an expert witness on the same subject, either in their case in chief or on rebuttal	April 1, 2017
Deadline for amending pleadings	April 9, 2017
All motions related to discovery must be noted on the motion calendar no later than the Friday before discovery closes pursuant to LCR 7(d) or LCR 37(a)(2)	May 26, 2017
Fact Discovery completed by	June 1, 2017
Disclosure and Reports from expert witnesses under FRCP 26(a)(2) due	June 15, 2017
Disclosure and Reports of Rebuttal Experts	July 10, 2017
Expert discovery completed by	August 4, 2017
Settlement conference held no later than	August 11, 2017
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter ( <i>see</i> LCR 7(d)(3))	August 17, 2017

Event	Date
Agreed pretrial order due	October 20, 2017
Pretrial conference to be scheduled by Court	
Trial briefs, proposed voir dire questions, proposed jury instructions, trial exhibits, witness lists and motions in limine due	November 1, 2017
Jury Trial Length of Trial: 10-15 days	November 6, 2017

IT IS SO STIPULATED.

RESPECTFULLY SUBMITTED this 23rd day of January, 2017.

HILLIS CLARK MARTIN & PETERSON P.S.

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By s/ Alec H. Boyd

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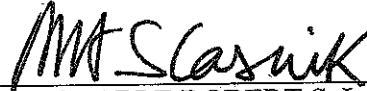
Attorneys for Defendant National Union Fire  
Insurance Company of Pittsburgh, PA

Attorneys for Defendants Certain  
Underwriters at Lloyd's, London and  
Wuerttembergische Versicherung A.G.

ORDER

IT IS SO ORDERED

DATED this 24<sup>th</sup> day of January, 2017.



THE HONORABLE ROBERT S. LASNIK  
UNITED STATES DISTRICT COURT JUDGE

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