

DONAHUE & HORROW, LLP

THE HONORABLE RICARDO S. MARTINEZ

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IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ABRAHAM GHORBANIAN, D.D.S.

Plaintiff,

vs.

GUARDIAN LIFE INSURANCE COMPANY OF AMERICA, BERKSHIRE LIFE INSURANCE COMPANY OF AMERICA and DOES 1 THROUGH 10,

Defendants.

Case No. 2:14-CV-01396-RSM

**UNOPPOSED REQUEST TO
EXTEND THE NOTING DATE AND
BRIEFING SCHEDULE
REGARDING DEFENDANTS'
MOTION TO DISMISS AND ORDER**

Plaintiff Abraham Ghorbanian, D.D.S., by his undersigned counsel, respectfully moves the Court to extend the noting date for Defendants Guardian Life Insurance Company of America (“Guardian”) and Berkshire Life Insurance Company of America’s (“Berkshire”) (“collectively referred to as “Defendants”) Motion for Spoliation Sanctions, Including Dismissal. This Motion is currently noted on the Motion Calendar for March 24, 2017. Plaintiff respectfully requests that the Noting Date on this motion be extended to April 14, 2017.

UNOPPOSED MOTION TO EXTEND NOTING DATE FOR DEFENDANTS’ MOTION TO DISMISS AND ORDER
Case No.: 2:14-CV-01396-RSM
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1 As grounds for this request Plaintiff states that the request is being made as counsel have
 2 travel commitments and scheduling conflicts with respect to this case and other cases making it
 3 difficult to meet the deadlines imposed under the March 24, 2017 Noting Date and, in response
 4 to this Motion, Plaintiff is contemplating obtaining declarations from various third parties who
 5 may be unavailable before the time Plaintiff's opposition is due under the March 24, 2017
 6 noting date.

7 This request is being made in good faith and not for the purposes of delay. Extending the
 8 Noting Date to April 14, 2017 does not have an effect on any of the other case deadlines.
 9 Finally, Defendants have no opposition to the continuance of the Noting Date to April 14, 2017.

10 Therefore, Plaintiff respectfully requests that the Noting Date and all related deadlines for
 11 Defendants' Motion for Spoliation Sanctions, including Dismissal, be continued from March 24,
 12 2017 to April 14, 2017.

13
 14 Dated this 10th day of March, 2017.

By :/s/ Michael B. Horrow

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ORDER

Based on the above Unopposed Request to Extend the Noting Date for Defendants' Motion for Spoliation Sanctions, Including Dismissal, and for good cause shown, IT IS SO ORDERED that the Noting date on Defendants' Motion for Spoliation Sanctions is continued to April 14, 2017.

DATED this 13 day of March 2017.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE