

Honorable Robert S. Lasnik

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

YESENIA PACHECO, LUIS LEMUS, and
S.L.P., minor child, by and through her
Guardian ad Litem Brian Comfort,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

NO. C15-1175 RSL

STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING CERTAIN
PRETRIAL DEADLINES

**Noted on the Motion Calendar:
October 31, 2018**

COME NOW the parties, and respectfully agree and request that the Court extend the deadline for certain pretrial deadlines, in particular the deadline for expert disclosures and the discovery deadline. Currently, pursuant to the Minute Order Setting Trial Dates and Related Dates, this matter is set for trial on May 6, 2019. Disclosure of expert testimony under FRCP 26(a)(2) is due by November 7, 2018. Discovery must be completed by January 6, 2019. *See* Docket Order No. 49.

The parties request an extension through November 21, 2018 to complete the disclosure of expert testimony and an extension through January 22, 2019 to complete discovery. Since this case was filed, both parties have worked cooperatively in the discovery process. Despite best and good faith efforts, the parties anticipate that the reports from their respective experts will not be completed in time to meet the current deadline of November 7,

STIPULATION AND ORDER EXTENDING PRETRIAL DEADLINE
C15-1175 RSL-1

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

1 2018. The parties further anticipate that discovery, including the depositions of respective
2 experts, will not be completed in time to meet the current discovery deadline of January 6,
3 2019.

4 Accordingly, the parties agree and respectfully request that the Court order this
5 extension of the expert disclosure deadline and discovery deadline.

6
7 DATED this 31st day of October, 2018.

8 Respectfully submitted,

9
10 By:

s/ Steve Ralph Alvarez

Steve Ralph Alvarez, WSBA # 23051

705 S. 9th St., Ste. 304

Tacoma, WA 98405-4600

Steve@alvarezlaw.com

14 s/ Michael A. Maxwell

15 Michael A. Maxwell, WSBA # 21781

MAXWELL GRAHAM

16 1621 114th Ave. SE, Ste. 123

17 Bellevue, WA 98004

18 Mike@MaxwellGrahamLaw.com

19 Attorney for Plaintiffs

By:

ANNETTE L. HAYES

United States Attorney

s/ Patricia D. Gugin

PATRICIA D. GUGIN, WSBA #
43458

Assistant United States Attorney

United States Attorney's Office

1201 Pacific Avenue, Suite 700

Tacoma, Washington 98402

Phone: 253-428-3800

Fax: 253-428-3826

E-mail: pat.gugin@usdoj.gov

Attorney for Defendant

ORDER

Pursuant to the foregoing Stipulation, it is hereby

ORDERED, ADJUDGED and DECREED that the deadline for the disclosure of expert witnesses is extended from November 7, 2018 through November 21, 2018 (rebuttal reports due 30 days thereafter) and discovery also is extended from January 6, 2019 through January 22, 2019. All other dates in the current scheduling order shall remain unchanged.

DATED this 1st day of Nov., 2018 NSL

Robert S. Lasnik
Robert S. Lasnik
United States District Judge

Presented by:

s/ Steve Ralph Alvarez
Steve Ralph Alvarez, WSBA #
705 S. 9th St., Ste. 304
Tacoma, WA 98405-4600
Steve@alvarezlaw.com

s/ Michael A. Maxwell
Michael A. Maxwell, WSBA # 21781
MAXWELL GRAHAM
1621 114th Ave. SE, Ste. 123
Bellevue, WA 98004
Mike@MaxwellGrahamLaw.com
Attorney for Plaintiffs

1 ANNETTE L. HAYES

2 United States Attorney

3 s/ Patricia D. Gugin

4 PATRICIA D. GUGIN, WSBA # 43458

5 Assistant United States Attorney

6 United States Attorney's Office

7 1201 Pacific Avenue, Suite 700

8 Tacoma, Washington 98402

9 Phone: 253-428-3800

10 Fax: 253-428-3826

11 E-mail: pat.gugin@usdoj.gov

12 Attorney for Defendant

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
STIPULATION AND ORDER EXTENDING PRETRIAL DEADLINE
C15-1175 RSL-4

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800