City of Seattle v. Monsanto Company et al Doc. 154 Case 2:16-cv-00107-RSL Document 153 Filed 04/23/20 Page 1 of 5 THE HONORABLE ROBERT S. LASNIK 1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE CITY OF SEATTLE, a municipal Case No. 2:16-CV-00107-RSL 8 corporation, located in the County of King, State of Washington, STIPULATED MOTION TO EXTEND 9 STAY OF CASE Plaintiff, 10 v. 11 MONSANTO COMPANY, SOLUTIA INC., and PHARMACIA CORPORATION, and 12 DOES 1 through 100, 13 Defendants. 14 Plaintiff and Defendants file this stipulated motion requesting that the Court extend the stay 15 of this case until July 31, 2020. The extension of the stay is necessary due, in part, to the current 16 situation with COVID-19. The current stay in this case expires on April 24, 2020. The parties 17 previously stipulated to a stay because the City represented that it cannot prosecute this complex case 18 without outside counsel. The City has represented that it still requires additional time to retain trial 19 counsel. The City further represents that it remains unable to respond to Defendants' discovery requests because it still lacks access to some of the documents it has already produced. Without access 20 to all of its documents, the City represents that it cannot prepare witnesses for depositions and cannot 21 identify whether documents still need to be produced. Additionally, the City represents that it cannot 22 finalize expert reports. 23

STIPULATED MOTION TO EXTEND STAY - 1 (2:16-cv-00107-RSL)

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1 As before, the Plaintiff has agreed to work with Defendants' counsel to schedule depositions 2 of three City fact witnesses during the stay, providing that the depositions may be done in person. 3 The Parties agree that the trial schedule will need further modification. On or before July 31, 2020, the Parties will confer and propose a modification that will provide for Defendants to complete a 4 30(b)(6) deposition of the Plaintiff at least thirty days before the deadline for exchange of expert 5 reports. 6 Dated this 22<sup>nd</sup> day of April, 2020. 7 PETER S. HOLMES 8 Seattle City Attorney 9 By: /s/ Laura B. Wishik Peter S. Holmes, WSBA #15787 10 Laura B. Wishik, WSBA # 16682 Email: Laura.Wishik@seattle.gov 11 Attorneys for Plaintiff 12 SEATTLE CITY ATTORNEY'S OFFICE 701 Fifth Avenue, Suite 2050 13 Seattle, WA 98104 14 Telephone: (206) 684-8200 Attorneys for Plaintiff 15 SCHWABE, WILLIAMSON & WYATT, P.C. 16 17 By: /s/ Jennifer L. Campbell Jennifer L. Campbell, WSBA No. 31703 Email: jcampbell@schwabe.com 18 Connie Sue M. Martin, WSBA No. 26525 Email: csmartin@schwabe.com 19 1420 5th Avenue, Suite 3400 Seattle, WA 98101 20 Telephone: (206) 622-1711 Fax: (206) 292-0460 21 Attorneys for Defendants, Monsanto Company, Solutia Inc., and Pharmacia 22 LLC 23

STIPULATED MOTION TO EXTEND STAY - 2 (2:16-cv-00107-RSL)

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23	me, and i minued also

## **ORDER**

It is so ordered.

Dated this 23rd day of April, 2020.

MMS Casnik
THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT