

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Honorable James Robart

United States District COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KISCHE USA LLC, a Washington limited
liability company,

Plaintiff,

V.

ALI SIMSEK, et al;

Defendants.

No. 2:16-cv-00168-JLR

MOTION FOR STIPULATED AND
AGREED ORDER OF CONTINUANCE OF
DEADLINE FOR EXPERT WITNESS
DISCLOSURE PURSUANT TO FRCP 26(A)

NOTED FOR HEARING

OCTOBER 11, 2017

I. RELIEF REQUESTED

The parties in this matter respectfully request that the Court grant a 30-day continuance of the deadline for expert witness disclosure pursuant to FRCP 26(A) on the order setting case schedule. The reason this continuance is necessary and appropriate is to accommodate analysis of discovery that is still ongoing. Because a documentary discovery has not yet been completed, the parties do not yet know the full scope of the expert opinions. A continuance will allow the parties the necessary time to review discovery with their experts. Following such 30 days, on or about November 13, 2017, the parties' expert witness disclosure pursuant to FRCP 26(A) will be exchanged.

MOTION FOR STIPULATED AND AGREED ORDER
OF CONTINUANCE – Pg. 1 of 2

THE LAW OFFICE OF
DUBS ARI TANNER HERSCHLIP PLLC
627-5TH ST, STE 203, MUKILTEO, WA 98275
PHONE: (425) 903-3605
FAX: (425) 298-3918
WWW.MUKILTEOLAWFIRM.COM

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

II. STIPULATION

COME NOW the Plaintiff and all Defendants, by and through their attorneys of record, and hereby stipulate and agree to a continuance of the 30-day continuance of the deadline for expert witness disclosure pursuant to FRCP 26(A) on the order setting case schedule.

Dated: 10/11/2017 _____ /s/ Dubs Herschlip
Dubs A. T. Herschlip, WSBA No. 31652
Attorney for Plaintiff, Kische USA LLC

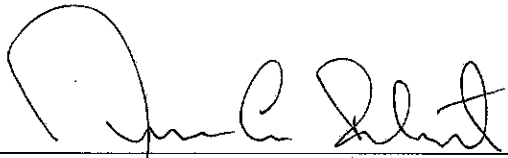
Dated: 10/11/2017 _____ /s/ Wesley Foreman
Donald H. Mullins, WSBA No. 4966
Wesley G. Foreman, WSBA No. 44269
Attorney for Defendants, Simsek, Walker, and
JD Stellar LLC

ORDER

THIS MATTER having come before the Court upon the Stipulation of all parties, and the Court having reviewed the Stipulation and finding good cause, it is hereby

ORDERED, ADJUDGED AND DECREED that the motion for continuance of the deadline for expert witness disclosure pursuant to FRCP 26(A) is hereby extended to November 13, 2017. All other Pretrial Deadlines remain in effect and will be enforced.

DONE IN OPEN COURT this 12th day of October, 2017.



The Honorable Judge James Robart