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THE HONORABLE JAMES L. ROBERT

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

DALE STRAWN,

Plaintiff,

v.

HAL NEDERLAND N.V., a Curacao corporation; HOLLAND AMERICA LINE N.V., a Curacao Corporation; HOLLAND AMERICA LINE, INC., a Washington corporation; HOLLAND AMERICA LINE-USA, INC., a Delaware corporation; STEINER MANAGEMENT SERVICES, LLC a Florida Limited Liability Company; STEINER TRANSOCEAN, LTD., a Bahama Corporation; STEINER TRANSOCEAN, U.S., INC., a Florida Company; and UNKNOWN DEFENDANTS 1-4.,

Defendants.

No. 2:16-cv-00214-JLR

**STIPULATED MOTION TO
CONTINUE REBUTTAL EXPERT AND
DISCOVERY DEADLINES ON THE
ISSUE OF MEDICAL BILLING
~~PROPOSED~~ ORDER**

**NOTE ON MOTION CALENDAR:
June 5, 2017**

MOTION

The parties respectfully request a continuation of deadlines related to the rebuttal medical billing expert report and discovery on the issue of medical billing by thirty days.

1 Due to the extensive medical billing documents, Defendants have not been able to find
2 a rebuttal expert who can meet the rebuttal expert report deadline of June 9, 2017. The parties
3 state that this Stipulated Motion to continue deadlines is not required due to any lack of
4 diligence on the part of any party or counsel.

5 The parties limit the discovery deadline extension to only reports and discovery on the
6 issue of medical billing. All other rebuttal reports will be submitted by June 9, 2017. All
7 other discovery will be completed by July 10, 2017. None of the Court's other deadlines will
8 be affected by the extension.

9 The parties are expected to mediate this case on July 14, 2017.

10 **STIPULATION**

11 The parties hereby stipulate to a continuance of the rebuttal medical billing expert
12 report deadline from June 9, 2017 to June 30, 2017. Additionally, the parties stipulate to a
13 continuance of discovery related to the issue of medical billing from July 10, 2017 to August
14 9, 2017.

15 DATED this 5th day of June, 2017.

16 s/Louis A. Shields

s/Jeffrey B. Maltzman

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~~PROPOSED~~ ORDER

It is so ordered.

DATED this 6th day of June, 2017.

THE HONORABLE JAMES L. ROBERT
UNITED STATES DISTRICT JUDGE
WESTERN DISTRICT OF WASHINGTON

Presented by:

NIELSEN SHIELDS, PLLC

By: s/ Louis A. Shields
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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington.

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