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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

**JOINT STIPULATION AND REQUEST  
TO EXTEND DISCOVERY DEADLINE  
AND ~~[PROPOSED]~~ ORDER**

**NOTE ON MOTION CALENDAR:  
June 30, 2017**

**MOTION**

COME NOW Defendants HAL Nederland N.V., Holland America Line N.V., Holland America Line, Inc., Holland America Line-USA, Inc., Steiner Management Services, LLC,

JOINT STIPULATION AND REQUEST TO EXTEND  
DISCOVERY DEADLINE AND [PROPOSED] ORDER  
No. 2:16-cv-00214-JLR – Page 1

**NIELSEN SHIELDS**  
P L L C  
1000 Second Avenue, Suite 1950  
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206.728.1300

1 Steiner Transocean, Ltd. and Steiner Transocean, U.S., Inc. and Plaintiff Dale Strawn, by and  
2 through their respective counsel, and file this Joint Stipulation and Request to Extend the  
3 Discovery Deadline to allow for the taking of two depositions after the current discovery  
4 deadline of July 10, 2017.

5 The Parties respectfully request to extend pre-trial deadlines to allow an additional  
6 three weeks to accommodate the schedules of two witnesses, Mark Barnard and Frank Smith.  
7 Despite the efforts of counsel, the parties have not been able to set dates before the upcoming  
8 deadline. Mediation is set for July 14 and the parties anticipate being able to complete these  
9 depositions with two weeks of the mediation date should the claim not resolve. The proposed  
10 extension will not affect any other scheduled dates and trial is still set to begin on November  
11 6, 2017. As such, the Parties respectfully request the court to extend the discovery deadline  
12 until July 28, 2017 to allow these depositions to take place.

13 **STIPULATION**

14 The parties hereby stipulate to a continuance of the <sup>discovery</sup> ~~pre-trial~~ deadline from July 10,  
15 2017 to July 28, 2017.

17 DATED this 30th day of June, 2017.

18 s/Louis A. Shields  
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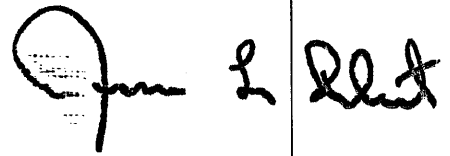
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~~PROPOSED~~ ORDER

It is so ordered.



DATED this 5<sup>th</sup> day of July, 2017.

\_\_\_\_\_  
THE HONORABLE JAMES L. ROBART  
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 30, 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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