

Honorable James L. Robart

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

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

NSA SAM,

Plaintiff,

v.

ROBERT D. KELLAMS, a Kent Police
Officer and his marital community; JOHN
PAGEL, a Kent Police Officer and his marital
community; MARK WILLIAMS, a Kent
Police Officer and his marital community;
and CITY OF KENT, a municipal
corporation,

Defendants.

No. 2:16-cv-00811-JLR

STIPULATED MOTION TO ALLOW
RULE 30(b)(6) DEPOSITION TO OCCUR
AFTER DISCOVERY CLOSES

NOTED FOR CONSIDERATION:
March 9, 2017

STIPULATED MOTION

The parties stipulate and jointly request that the Court permit Plaintiff Nsa Sam to take a Rule 30(b)(6) deposition of the City of Kent within two weeks after discovery closes. On February 27, three weeks before the discovery cutoff, Plaintiff properly requested a Rule 30(b)(6) deposition of the City related to training on high-risk stops and training on interpreting an NCIC and WACIC printout. The City’s designee to testify regarding these topics has been on leave out of state. He returns to work tomorrow, and is scheduled to work all night prior to

STIPULATED MOTION TO ALLOW RULE 30(b)(6)
DEPOSITION TO OCCUR AFTER DISCOVERY CLOSES
(No. 2:16-cv-00811-JLR) - 1

LAW OFFICES OF
MILLS MEYERS SWARTLING P.S.
1000 SECOND AVENUE, 30TH FLOOR
SEATTLE, WASHINGTON 98104
TELEPHONE (206) 382-1000
FACSIMILE (206) 386-7343

1 each of the two dates Plaintiff's counsel offered for the deposition. The City offered two other
2 dates for the deposition, but Plaintiff's counsel is in California those dates.

3 Accordingly, good cause having been shown, the parties request the Court permit
4 Plaintiff to take this 30(b)(6) deposition by April 3. The remainder of discovery will still close
5 on March 20 as the Court previously ordered.

6 DATED: March 9, 2017

7 CIVIL RIGHTS JUSTICE CENTER,
8 PLLC
9 Attorney for Plaintiff Nsa Sam

MILLS MEYERS SWARTLING P.S.
Attorneys for the City of Kent, retired
Sergeant Pagel, retired Officer Kellams, and
Officer Williams

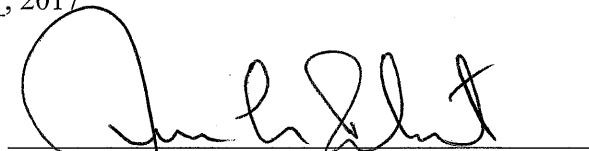
10 By: s/Darryl Parker per 3/9/17 telephonic
11 authority
12 Darryl Parker, WSBA No. 30770
13 Civil Rights Justice Center PLLC
14 2150 North 107th Street, Suite 520
15 Seattle, WA 98133
16 Telephone: (206) 557-7719
17 Fax: (206) 659-0183
18 E-mail:
19 dparker@civilrightsjusticecenter.com

By: s/Nikki C. Carsley
Geoffrey Grindeland, WSBA No. 35798
Nikki C. Carsley, WSBA No. 46650
Mills Meyers Swartling P.S.
1000 2nd Avenue, 30th Floor
Seattle, WA 98104
Telephone: (206) 382-1000
Fax: (206) 386-7343
E-mail: ggrindeland@millsmeyers.com
ncarsley@millsmeyers.com

17 **ORDER**

18 Based on the foregoing, IT IS SO ORDERED.

19 DATED: 9 March, 2017

20
21 
22 _____
23 Honorable James L. Robart

24
25
26

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

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Ada Ko Wong: ada@akw-law.com, adakowong.esq@gmail.com, paralegal@akw-law.com

Darryl Parker: dparker@civilrightsjusticecenter.com, ogee@civilrightsjusticecenter.com, amichel@civilrightsjusticecenter.com, rstefanski@civilrightsjusticecenter.com

I further certify that I mailed a true and correct copy of the foregoing to the following non-CM/ECF participants:

N/A

Dated this 9th day of March 2017.

s/Anna Armitage

Anna Armitage