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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRANBAR, LLC,

Plaintiff,

v.

FIRST AMERICAN TITLE INSURANCE
COMPANY,

Defendant.

NO. 16-CV-00842-RSL

**STIPULATED MOTION TO
ALLOW DEPOSITION OF
PLAINTIFF'S EXPERT WITNESS
AFTER DISCOVERY DEADLINE**

Pursuant to Fed. R. Civ. P. 29, LR 7(d)(1) and LR 10(g), the parties hereby stipulate to and move the Court for an Order allowing defendant to take the deposition of plaintiff's expert witness, Bruce J. Dodds, on Friday, March 3, 2017, which is after the current February 21, 2017 discovery deadline. Plaintiff's expert witness's office is located in Washington, but has been engaging in prolonged travel without any dates available to sit for a deposition in Washington State prior to the close of discovery. The parties' counsel have met and conferred with each other, and plaintiff's counsel has informed defendant that the earliest availability for an in-person deposition in Washington State is March 3, 2017. No other deadlines are being requested to be amended, and no other discovery is being requested to take place after the February 21, 2017 deadline. Extending the discovery deadline for this single deposition is justified because otherwise defendant and plaintiff would potentially have

1 to bear the unnecessary expense of out-of-state travel to conduct the deposition of an expert
2 witness whose place of business is Medina, Washington.

3 For the reasons identified above, the parties stipulate to allowing the deposition of
4 Bruce J. Dodds of Dodds Consulting Engineers, Inc. P.S. to be taken by defendant on
5 March 3, 2017 after the close of discovery.

6 DATED this 14th day of February, 2017.


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9 /s/ Robert M. Crowley

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IT IS SO ORDERED this 14th day of February, 2017.



Robert S. Lasnik
United States District Judge