

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

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
IN SEATTLE**

WESTRIDGE TOWNHOMES
OWNERS ASSOCIATION,

Plaintiff,

v.

GREAT AMERICAN ASSURANCE
COMPANY, a foreign insurance
company, as successor to
AGRICULTURAL INSURANCE
COMPANY; GREENWICH
INSURANCE COMPANY, a foreign
insurance company,

Defendants.

No. C16-1011 RSM

STIPULATED MOTION &
PROPOSED ORDER TO EXTEND
DISCOVERY DEADLINE

Plaintiff Westridge Townhomes Owners Association and Defendants Great American
Assurance Company and Greenwich Insurance Company (collectively the “Parties”) submit

STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 1

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1 the following stipulated motion to extend the discovery deadline for the purpose of taking two
2 depositions.

3 The current discovery completion date is December 18, 2017 (*see Dkt. 37*). Plaintiff
4 has requested the depositions of two of Defendants' experts, Jim Perrault and Dennis Smith.
5 These two witnesses are not available for deposition until after the current discovery cut-off.
6 The Parties bring this Stipulated Motion and ask that the Court extend the discovery
7 completion date by four days to complete the depositions of Mr. Perrault and Mr. Smith. The
8 witnesses have indicated that they are available for deposition beginning December 19.

9 Good cause exists to extend the deadline to depose the above-named witnesses and
10 doing so will not prejudice any party. Moreover, a short extension of this deadline will not
11 impact the other dates in the Court's Order.

12 DATED this 5th day of December 2017.

13 HARPER | HAYES PLLC

BETTS, PATTERSON & MINES, P.S.

14
15 By: s/ Todd C. Hayes
Todd C. Hayes, WSBA No. 26361
16 s/ Charles K. Davis
Charles K. Davis, WSBA No. 38231
17 600 University Street, Suite 2420
Seattle, WA 98101
18 **Tel.:** 206.340.8010
Fax: 206.260.2852
19 **Email:** todd@harperhayes.com
cdavis@harperhayes.com
20 Attorneys for Plaintiff

By: s/ Joseph D. Hampton
Joseph D. Hampton, WSBA #15297
One Convention Place, Suite 1400
701 Pike Street
Seattle, WA 98101-3927
Tel.: 206.292.9988
Fax: 206.343.7053
Email: jhampton@bpmlaw.com
Attorneys for Defendant Great American
Assurance Company

21
22
23 STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 2

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1 MOUND, COTTON, WOLLAN &
2 GREENGRASS, LLP

3 By: s/ Kevin F. Buckley

4 Kevin F. Buckley, Admitted *Pro Hac Vice*

5 One New York Plaza, 44th Floor

6 New York, NY 1004

7 **Tel.:** 212.804.4242

8 **Fax:** 212.344.8066

9 **Email:** kbuckley@moundcotton.com

10 Attorneys for Defendant Greenwich

11 Insurance Company

12 BULLIVANT HOUSER BAILEY PC

13 By: s/ Owen R. Mooney

14 Owen R. Mooney, WSBA #45779

15 1700 Seventh Avenue, Suite 1810

16 Seattle, WA 98101-1397

17 **Tel.:** 206.290.8930

18 **Fax:** 206.386.5130

19 **Email:** owen.mooney@bullivant.com

20 Attorneys for Defendants Great

21 American Assurance Company and

22 Greenwich Insurance Company

23 STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 3

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

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

ORDER

Based on the above stipulation, the deadline to complete discovery for the purpose of deposing Defendants' experts, Jim Perrault and Dennis Smith is extended to December 22, 2017.

DATED this 6th day of December 2017.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

HARPER | HAYES PLLC

By: s/ Todd C. Hayes
Todd C. Hayes, WSBA No. 26361
s/ Charles K. Davis
Charles K. Davis, WSBA No. 38231
Attorneys for Plaintiff

BETTS, PATTERSON & MINES, P.S.

By: s/ Joseph D. Hampton
Joseph D. Hampton, WSBA #15297
Attorneys for Defendant Great American
Assurance Company

1 MOUND, COTTON, WOLLAN & GREENGRASS, LLP

2

By: s/ Kevin F. Buckley
Kevin F. Buckley, Admitted *Pro Hac Vice*
Attorneys for Defendant Greenwich Insurance Company

4

5 BULLIVANT HOUSER BAILEY

6

By: s/ Owen R. Mooney
Owen R. Mooney, WSBA #45779
Attorneys for Defendants Great American
Assurance Company and Greenwich Insurance
Company

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 5

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852