

The Honorable Judge 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

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

ROBERT L. KIRSCHAMAN,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

NO. C16-1111JLR

STIPULATION AND ~~PROPOSED ORDER~~  
FOR EXTENSION OF PRE-TRIAL  
DEADLINE

**Noted for consideration:  
August 18, 2017**

**JOINT STIPULATION**

The parties, by and through their counsel of record, hereby STIPULATE AND AGREE  
to an extension of the following pre-trial deadline:

<u>Description</u>	<u>Old Deadline</u>	<u>New Deadline</u>
Rebuttal Expert Disclosure	September 16, 2017	October 16, 2017

STIPULATION AND PROPOSED ORDER FOR  
EXTENSION OF PRE-TRIAL DEADLINE  
Kirscheman/C16-1111JLR - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101-1271  
206-553-7970

1 Pursuant to Fed. R. Civ. P. 26(a)(2)(C)(ii), the United States has 30 days after the  
2 disclosure of Plaintiff's expert reports to submit any rebuttal reports related to the same subject  
3 matter. The Plaintiff submitted his expert disclosures on August 18, 2017, and the United States  
4 requests a 30-day extension of its deadline to disclosure rebuttal reports. During this interim  
5 period, the United States is continuing to collect the Plaintiff's medical records documenting his  
6 health prior to the incident at issue. Additionally, the parties are continuing to work towards a  
7 settlement before the United States expends additional resources for its experts to draft written  
8 reports, and conduct a medical exam of the Plaintiff. To facilitate obtaining the necessary  
9 medical records needed by the United States' experts, and to potentially assist in resolution of  
10 this matter prior to trial, the parties agree to an extension of the United States' rebuttal experts to  
11 October 16, 2017

12 The requested extension will not affect the current trial date, scheduled February 12,  
13 2018.

14 DATED this 18th day of August, 2017.

15 ANNETTE L. HAYES  
16 United States Attorney,

17 /s/David W. Robinson  
18 DAVID ROBINSON, WSBA No. 3780  
19 Robinson & Kole  
20 911 Dupont  
21 Bellingham, WA 98225  
22 Phone: 425-646-7767  
23 Fax: 425-646-1011  
24 Email: mattd@robinsonandkole.com

25 Attorney for Plaintiff

17 /s/Lisca Borichewski  
18 LISCA BORICHEWSKI, WSBA No. 24300  
19 Assistant United States Attorney  
20 United States Attorney's Office, Western Dist.  
21 700 Stewart Street, Suite 5220  
22 Seattle, Washington 98101-1271  
23 Phone: 206-553-7970  
24 Email: lisca.borichewski@usdoj.gov

25 Attorney for United States

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

**ORDER**

The parties having so stipulated and agreed, it is hereby **SO ORDERED**. The rebuttal expert disclosure deadline is now October 16, 2017. The Clerk is directed to send copies of this Order to all counsel of record.

DATED this 21<sup>st</sup> day of August, 2017.



JAMES L. ROBART  
United States District Court Judge