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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BEHROUZ SHOKRI,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware  
Corporation,

Defendant.

No. C16-1132 RSM

STIPULATED MOTION AND ORDER  
TO EXTEND DEADLINE FOR  
PLAINTIFF'S DISCOVERY MOTION

1. Pursuant to FRCP 16, Plaintiff Behrouz Shokri and Defendant The Boeing Company (collectively, "the Parties"), respectfully request that the Court grant Plaintiff an additional week to file his discovery motion pursuant to this Court's August 24, 2017 Order on Plaintiff's Motion to Compel. The Parties have conferred and jointly represent that good cause exists for this extension, making Plaintiff's motion to compel due on September 22, 2017, so that Plaintiff can evaluate Defendant's recent supplementation to determine what issues remain to be heard by this Court.

**A. STATEMENT OF FACTS**

2. Plaintiff filed his Complaint for Damages on July 22, 2016. *Dkt.* 1. The current trial date is January 22, 2018, the discovery cutoff is September 25, 2017, and the deadline for filing discovery motions was August 25, 2017. *Dkt.* 12.

3. Plaintiff filed a Motion to Compel Answers to Discovery and Production of Documents on July 6, 2017. *Dkt.* 15.



1 would give Plaintiff the necessary time to evaluate the production and answers received two  
2 days before the deadline for his motion to compel, set by the Court. The Parties jointly  
3 represent that good cause exists for the Court to extend the deadline for Plaintiff's motion to  
4 compel by one week, making it due September 22, 2017.

5 **D. CONCLUSION**

6 For the above-stated reasons, the Parties respectfully request that the Court grant their  
7 Stipulated Motion allowing Plaintiff an additional week to file a motion to compel, as  
8 described above.

9 STIPULATED to this 14th day of September, 2017.  
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22 **PURSUANT TO STIPULATION, IT IS SO ORDERED** this 15<sup>th</sup> day of  
23 September 2017.

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25 RICARDO S. MARTINEZ  
26 CHIEF UNITED STATES DISTRICT JUDGE