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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BEHROUZ SHOKRI,  
  
Plaintiff,  
v.  
THE BOEING COMPANY,  
  
Defendant.

No. 2:16-cv-01132 RSM

**STIPULATED MOTION TO  
CONTINUE DISPOSITIVE MOTIONS  
AND PRETRIAL DEADLINES AND  
TRIAL DATE**

Pursuant to Federal Rule of Civil Procedure 16, and Local Rule 16(b)(4), Plaintiff Behrouz Shokri and Defendant The Boeing Company (collectively, “the Parties”), respectfully move for a limited continuance of the trial date and certain related dates. This is the first continuance that the parties have sought. The Parties have conferred and jointly represent that good cause exists for this extension. In support, the Parties state as follows:

**A. STATEMENT OF FACTS**

1. Under the Court’s Order Setting Trial Date and Related Dates (Dkt. 12), this case is currently subject to the following remaining deadlines:

- a. Dispositive motion deadline: October 24, 2017
- b. Motions in limine deadline: December 26, 2017
- c. Agreed pretrial order due: January 10, 2018
- d. Pretrial conference: January 10, 2018

- 1 e. Trial briefs, proposed voir dire questions,  
2 jury instructions, neutral statement of the  
3 case, and trial exhibits due: January 10, 2018  
4 f. Jury trial (5-10 days): January 22, 2018

5 2. As a general matter, discovery recently closed on September 25, 2017. However,  
6 pursuant to court-approved stipulations, as well as the Court's recent ruling on September 29,  
7 certain discovery matters remain to be completed.

8 3. First, on September 29, 2017, the Court granted in part Boeing's Motion to Compel.  
9 The Court also directed Plaintiff to reappear for a continued (2-hour) deposition by no later than  
10 October 20, 2017. Due to various scheduling conflicts, the Parties will need to complete this  
11 deposition during the week of October 30, 2017.

12 4. Second, through the same September 29 ruling, the Court granted Plaintiff's request  
13 to take the deposition of Mr. Shokri's manager's former manager, Jose Amoedo, by no later than  
14 October 24. Due to the same scheduling conflicts referenced above, the parties similarly will need  
15 to complete this deposition during the week of October 30, 2017.

16 5. Third, through the same September 29, ruling the Court required Defendant to  
17 provide rebuttal experts reports by October 30, 2017. Mr. Shokri will need to complete these  
18 rebuttal expert depositions after Defendant provides reports.

19 6. Fourth, the Court approved the Parties' stipulation to complete a Fed. R. Civ. P.  
20 30(b)(6) deposition of Boeing after the discovery cutoff. (Dkt. 70.) The precise scope of that  
21 30(b)(6) deposition remains pending before the Court, however, as do certain other discovery  
22 issues raised in Plaintiff's Motion to Compel Answers to Discovery and Production of Documents,  
23 recently filed on September 22, 2017. (Dkt. 71.) Boeing responded to that Motion on October 10,  
24 2017, and Plaintiff filed his reply on October 13, 2017. (Dkts. 82, 85.) This timing creates an  
25 understandable likelihood that the Court will not have an opportunity to issue a comprehensive  
26 ruling on Plaintiff's motion sufficiently in advance of the Parties' current October 24 deadline to  
file dispositive motions.



1 **C. CONCLUSION**

2 For the above-stated reasons, the Parties respectfully request that the Court grant their  
3 Stipulated Motion, and continue the dispositive motions and pretrial deadlines as follows:

- 4 a. Dispositive motion deadline: from October 24, 2017 to January 16, 2018  
5 b. Motions in limine deadline: from December 26, 2017 to March 20, 2018  
6 c. Agreed pretrial order due: from January 10, 2018 to April 4, 2018  
7 d. Pretrial conference: from January 10, 2018 to April 4, 2018  
8 e. Trial briefs, proposed voir dire  
9 questions, jury instructions,  
10 neutral statement of the  
11 case, and trial exhibits due: from January 10, 2018 to April 4, 2018  
12 f. Jury trial: from January 22, 2018 to April 16, 2018

12 The Parties also request that the Court grant their stipulation to complete the continued  
13 deposition of Mr. Shokri and the deposition of Mr. Amoedo—as authorized by the Court’s  
14 September 29 ruling—by no later than November 3, 2017.

15 **IT IS SO STIPULATED.**

16 Dated: October 18, 2017

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**HAVING REVIEWED THE PARTIES' STIPULATION, THE EXISTING TRIAL DATE AND PRETRIAL DEADLINES ARE ORDERED TO BE EXTENDED AS FOLLOWS:**

- a. Dispositive motion deadline: from October 24, 2017 to **January 16, 2018**
- b. Motions in limine deadline: from December 26, 2017 to **March 20, 2018**
- c. Agreed pretrial order due: from January 10, 2018 to **April 4, 2018**
- d. Pretrial conference: from January 10, 2018 to **TBD**

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- e. Trial briefs, proposed voir dire questions, jury instructions, neutral statement of the case, and trial exhibits due: from January 10, 2018 to **April 11, 2018**
- f. Jury trial: from January 22, 2018 to **April 16, 2018**

The Parties also request that the Court grant their stipulation to complete the continued deposition of Mr. Shokri and the deposition of Mr. Amoedo – as authorized by the Court’s September 29 ruling – by no later than November 3, 2017.

DATED this 19th day of October, 2017.

  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

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