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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Diversified Lenders, LLC, an Oklahoma
limited liability company,

Plaintiff,

v.

Amazon Logistics, Inc., a Delaware
corporation; Vertical Holdings Unlimited,
LLC, a Florida limited liability company
doing business as VHU Express,

Defendants.

No. 2:16-cv-01232-RSL

STIPULATED MOTION AND ORDER
ALLOWING COMPLETION OF
DEPOSITIONS OUTSIDE DISCOVERY
CUTOFF

NOTE ON MOTION CALENDAR:
July 21, 2017

Amazon Logistics, Inc.,

Cross-Claim Plaintiff,

v.

Vertical Holdings Unlimited, LLC,

Cross-Claim Defendant.

STIPULATION

Before the discovery cutoff, Plaintiff Diversified Lenders, LLC (“Diversified”) had noticed three depositions of Defendant Amazon Logistics, Inc. (“Amazon”) witnesses. On April 24, 2017, Diversified conducted the deposition of Amazon’s representative William Harvey,

STIPULATED MOTION AND ORDER TO ALLOW DEPOSITIONS
OUTSIDE DISCOVERY CUTOFF - 1

1 which deposition was not completed and has been continued. In addition, on or about May 17,
2 2017, Diversified temporarily withdrew previously served notices of taking deposition of
3 Amazon's Rule 30(b)(6) corporate representative, and Amazon's employee Kara Walters.
4 Amazon has agreed that Diversified may complete the depositions outside of the discovery
5 cutoff. Diversified and Amazon now, by their undersigned counsel, move the Court, pursuant to
6 LCR 10(g), LCR 7(d)(1), LCR 16(b) and Fed. R. Civ. P. 16, for entry of an Order modifying the
7 Court's Amended Order Setting Trial Date & Related Dates (Dkt. # 72) ("Scheduling Order") to
8 allow Diversified to complete previously-noticed depositions outside of the discovery cutoff.
9 The parties agree that the depositions previously noticed before the discovery cutoff by
10 Diversified shall proceed as follows:

- 11 1. William Harvey, individually and as a Fed. R. Civ. P. 30(b)(6) corporate
12 designee concerning topics as previously designated by Amazon: July 25,
13 2017, at the Law Offices of Ullman & Ullman, P.A. in Boca Raton,
14 Florida.
- 15 2. Amazon's Fed. R. Civ. P. 30(b)(6) witness on designated topics: August
16 15, 2017, in Seattle, Washington.
- 17 3. Kara Walters August 16, 2017, in Seattle, Washington.

18 Diversified's Motion to Modify the Court's Amended Order Setting Trial Date & Related Dates
19 (Dkt. #93) remains pending.

20
21 DATED: July 21, 2017 /s/ Vanessa S. Power
22 Vanessa S. Power (WSBA No. 30777)
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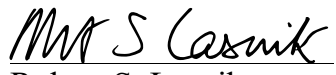
DATED: July 21, 2017 /s/ Jared A. Ullman

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ORDER

SO ORDERED this 28th day of July, 2017.


Robert S. Lasnik
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on July 28, 2017, I electronically filed the foregoing document with
3 the Clerk of the Court using the CM/ECF System, which in turn automatically generated a
4 Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the
5 CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic
6 notice.

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Attorneys for Plaintiff

18 DATED at Seattle, WA on July 28, 2017.

19 *s/ Leslie Lomax*
20 Leslie Lomax, Litigation Practice Assistant
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