

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JOSIAH HUNTER,

Plaintiff,

v.

CITY OF FEDERAL WAY, FEDERAL WAY  
POLICE DEPARTMENT, FEDERAL WAY  
POLICE OFFICER KRIS DURRELL,  
FEDERAL WAY POLICE CHIEF ANDY J.  
HWANG, JOHN DOE AND JANE DOE  
OFFICERS,

Defendants.

NO. 2:16-cv-01445-RSL

STIPULATED MOTION AND  
~~PROPOSED~~ ORDER FOR EXTENSION  
OF TIME TO FILE MOTIONS IN LIMINE

NOTED ON MOTION CALENDAR:

NOVEMBER 9, 2017

STIPULATED MOTION

Pursuant to LCR 7(j), the parties respectfully request that this Court grant relief from and extend the deadline for filing Motions in Limine to Wednesday, November 15, 2017. According to the case scheduling order, these motions were due for filing on Monday, November 6th and to be noted for Friday, November 17th.

On November 3, 2017, plaintiff's counsel informed defense counsel that James Bible is currently in a criminal trial in the case of *State v. Puloka*, King County Superior Court, Case No. 14-

STIPULATION AND ~~PROPOSED~~ ORDER  
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MOTIONS IN LIMINE  
(2:16-cv-01445-RSL) - 1

CHRISTIE LAW GROUP, PLLC  
2100 WESTLAKE AVENUE N., SUITE 206  
SEATTLE, WA 98109  
206-957-9669

1 1-06829-4 SEA. This trial is not expected to conclude until the week of January 8, 2018,  
2 overlapping the trial of the instant matter, which is currently scheduled to begin December 4, 2017.  
3 On Friday, November 3, 2017, the parties discussed the issue and planned to file a stipulated motion  
4 to move the trial date on Monday, November 6, 2017. The parties also agreed they would not file  
5 motions in limine on that date, given the request for a new trial and the fact that a ruling on  
6 defendants' outstanding motion for partial summary judgment would likely impact the scope and  
7 nature of those motions. The hope was that filing them later, after receiving a ruling, would better  
8 serve the interests of judicial economy. The parties have continued to discuss the nature of a  
9 stipulation to move the trial date, but given the scheduling conflicts identified by the Court and by  
10 defense counsel, a complete stipulation will not be possible, as defendants will not agree to continue  
11 the trial date past April 9, 2018. Plaintiff's counsel intends to file a motion to continue the trial date  
12 as soon as possible.

13 In the meantime, and in the event the Court does not grant the anticipated motion to move  
14 the trial date, the parties wish to file motions in limine as quickly as possible. In order to  
15 accommodate plaintiff's counsel's trial schedule, the parties request a new deadline to file motions  
16 in limine of Wednesday, November 15th. Defendants will file their motions in limine today, and  
17 plaintiff will respond to them by Thursday, November 16th. The defendant will agree to file its  
18 responses to plaintiff's motions in limine no later than Thursday, November 16<sup>th</sup>. This will allow  
19 the parties to file optional replies on Friday, November 17th, the note date for the motions in limine.

20 DATED this 9<sup>th</sup> day of November, 2017.

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STIPULATION AND [PROPOSED] ORDER  
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**CHRISTIE LAW GROUP, PLLC**  
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SEATTLE, WA 98109  
206-957-9669

1 CHRISTIE LAW GROUP, PLLC

JAMES BIBLE LAW GROUP

2 By /s/ Ann E. Trivett  
ANN E. TRIVETT, WSBA #39228  
3 Attorneys for Defendants  
2100 Westlake Avenue North, Suite 206  
4 Seattle, WA 98109  
Email: [ann@christielawgroup.com](mailto:ann@christielawgroup.com)

By /s/ James Bible  
JAMES BIBLE, WSBA #33985  
Attorney for Plaintiff  
14205 SE 36<sup>th</sup> St., Ste. 100  
Bellevue, WA 98006  
Email: [jbiblesblaw@gmail.com](mailto:jbiblesblaw@gmail.com)

6 VALDEZ LEHMAN, PLLC

7 By /s/ Jesse Valdez  
JESSE VALDEZ, WSBA #35378  
8 Attorney for Plaintiff  
600 108<sup>th</sup> Ave. NE, Ste. 347  
9 Bellevue, WA 98004  
[jess@valdezlehman.com](mailto:jess@valdezlehman.com)

**ORDER**

THIS MATTER having come before the Court on the stipulated motion of counsel to extend the deadline for motions in limine, and the Court being fully apprised after reviewing the record and finding the motion to be in order; NOW THEREFORE

IT IS HEREBY ORDERED that the deadline for filing Motions in Limine is extended up to and including November 15, 2017. Those motions should still be noted for Friday, November 17, 2017.

SIGNED THIS 14<sup>th</sup> day of Nov., 2017.



HON. ROBERT S. LASNIK  
UNITED STATES DISTRICT JUDGE

Presented by:  
CHRISTIE LAW GROUP, PLLC

By /s/ Ann E. Trivett  
ANN E. TRIVETT, WSBA #39228  
Counsel for Defendants

Approved as to form, notice of presentation waived:  
JAMES BIBLE LAW GROUP

By /s/ James Bible  
JAMES BIBLE, WSBA #33985  
Counsel for Plaintiff

/s/ Jesse Valdez  
JESSE VALDEZ, WSBA #35378  
Attorney for Plaintiff  
600 108<sup>th</sup> Ave. NE, Ste. 347  
Bellevue, WA 98004  
[jess@valdezlehman.com](mailto:jess@valdezlehman.com)