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HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KYANN FLINT,

Plaintiff,

v.

WESTERN WASHINGTON UNIVERSITY  
BOARD OF TRUSTEES,

Defendant.

NO. 2:16-cv-01674-JLR

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME TO  
DISCLOSE EXPERT TESTIMONY  
AND SERVE DISCOVERY**

**STIPULATION**

The parties are presently trying to resolve this matter and prefer to spend their limited resources focused on those efforts at this time. To that end, the parties hereby jointly stipulate to and request the Court to continue the deadline for parties to exchange Expert Testimony by October 27, 2017, and complete Discovery by December 27, 2017, as set forth in the proposed order below.

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STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME  
TO DISCLOSE EXPERT TESTIMONY AND SERVE DISCOVERY - 1

GARVEY SCHUBERT BARER  
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206 464 3939

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STIPULATED TO this 19<sup>th</sup> day of September, 2017.

GARVEY, SCHUBERT & BARER

SCHWARTZ, ROLLER & ZWILLING

By s/Seth J. Berntsen  
Seth J. Berntsen, WSBA #30379  
Attorneys for Defendant

By s/Edward I. Zwilling, per email authority  
Edward I. Zwilling  
Alabama Bar #ASB-1564-L54-E  
Attorneys for Plaintiff

SHAW LAW GROUP PLLC

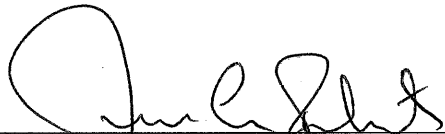
By s/Bridget Bourgette Shaw, per email authority  
Bridget Bourgette Shaw, WSBA #28850  
Attorneys for Plaintiff

**ORDER**

THIS MATTER having come on regularly before the undersigned Judge of the above-entitled Court pursuant to stipulation by the parties hereto through their respective counsels of record; and the Court being fully advised in the premises, now, therefore,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that the parties shall have until October 27, 2017 to serve Expert Testimony pursuant to FRCP 26(a)(2), and complete Discovery by December 27, 2017. *The deadline for dispositive motions shall remain on December 26, 2017.*

DONE IN OPEN COURT THIS 19<sup>th</sup> day of September, 2017.

  
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JUDGE JAMES L. ROBART

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Presented by:

GARVEY, SCHUBERT & BARER

By s/Seth J. Berntsen  
Seth J. Berntsen, WSBA #30379  
Of Attorneys for Plaintiff Foss

Approved as to Form; Notice of Presentation Waived:

SCHWARTZ, ROLLER & ZWILLING

By s/Edward I. Zwilling, per email authority  
Edward I. Zwilling, Alabama Bar #ASB-1564-L54-E  
Attorneys for Plaintiff

Approved as to Form; Notice of Presentation Waived:

SHAW LAW GROUP PLLC

By s/Bridget Bourgette Shaw, per email authority  
Bridget Bourgette Shaw, WSBA #28850  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2017, I electronically filed the foregoing STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO DISCLOSE EXPERT TESTIMONY AND SERVE DISCOVERY with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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SIGNED this 19<sup>th</sup> day of September, 2017 at Seattle, Washington.

/s/ Dominique Barrientes  
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