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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CERTAIN UNDERWRITERS at LLOYD’S,
LONDON, Subscribing to Policies Numbered
8029663, 8001778, 8071754, 8072492,
8072737, and 8071620,

Plaintiffs,

v.

JEFF PETTIT, an individual,

Defendant.

IN ADMIRALTY

No. 2:17-cv-00259-RSM

**STIPULATED MOTION TO AMEND
CASE SCHEDULE**

I. INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Civil Rules 7(d)(1), 7(j), 10(g) and 16(b)(4) the parties, plaintiff CERTAIN UNDERWRITERS at LLOYD’S, LONDON, Subscribing to Policies Numbered 8029663, 8001778, 8071754, 8072492, 8072737, and 8071620 (“Plaintiffs”), and defendant, Jeff Pettit (“Defendant”) by and through their respective counsel, jointly move this Court for an order extending the discovery deadline set forth in the Court’s December 13, 2017 Order Continuing Discovery Deadlines (Dkt. 28) as follows:

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Case Event	Current Deadline	New Deadline
Discovery Completed By	February 16, 2018	June 8, 2018, limited to Defendant supplementing the report and opinions of expert witness Mark Nordstrom once, and Plaintiffs having an opportunity to re-depose Mr. Nordstrom on the newly disclosed opinions
Deadline for Filing Motions related to limited additional discovery	January 2, 2018	June 22, 2018, but only for motions related to the limited additional discovery.

II. RELEVANT FACTS AND BASES FOR STIPULATED MOTION

The trial in this matter was recently continued into October due to a conflict in the Court’s docket. Defendant has a supplemental report from expert Mark Nordstrom to disclose and has sought to reopen discovery for the sole purpose of disclosing the Nordstrom supplemental report and providing Plaintiffs with an opportunity to depose Nordstrom. The parties have agreed that Plaintiffs will not oppose the opening of discovery for the sole purpose of supplementing the Nordstrom expert report so long as Defendant produces Nordstrom for a deposition no later than June 8, 2018. The parties further agree that the expert expense for the first hour of Mr. Nordstrom’s further deposition will be at Defendant’s expense. No other discovery is approved, contemplated or requested by the parties at this time.

The parties also request that the discovery motion deadline be extended to June 22, 2018, for the limited purpose of allowing the parties to raise any disputes arising out of the limited additional discovery contemplated by this stipulated motion. While the parties do not believe there will be any such disputes, they do not want to be without a remedy if such disputes arise.

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III. CONCLUSION

By this Motion, the parties propose a new discovery deadline for the limited purpose of disclosing the Nordstrom report and deposing Nordstrom as described above, together with an associated limited re-opening of the discovery motion deadline. The parties therefore jointly request that the Court amend the case schedule as set forth above and in the concurrently filed Proposed Order.

Respectfully submitted this 10th day of May, 2018.

NICOLL BLACK & FEIG PLLC

/s/ Christopher W. Nicoll

/s/ Chris P. Reilly

Christopher W. Nicoll, WSBA No. 20771

Chris P. Reilly, WSBA No. 25585

*Attorneys for Plaintiff Certain Underwriters
At Lloyds*

LEE SMART, P.S., INC.

Per E-Mail Authority

/s/ Donna M. Young

Donna M. Young, WSBA No. 15455

Attorneys for Defendant Jeff Pettit

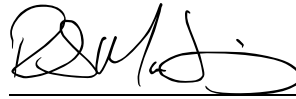
1 **ORDER**

2 Pursuant to the above stipulated motion, the Court hereby orders that the pre-trial
3 deadlines in this matter be continued and extended as follows:

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5 Case Event	Current Deadline	New Deadline
6 Discovery Completed By	February 16, 2018	June 8, 2018, limited to Defendant supplementing the report and opinions of expert witness Mark Nordstrom once, and Plaintiffs having an opportunity to re-depose Mr. Nordstrom on the newly disclosed opinions
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 Deadline for Filing Motions related to limited additional discovery	January 2, 2018	June 22, 2018, but only for motions related to the limited additional discovery.

DATED THIS 11th day of May 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date set forth below, I electronically filed the foregoing
3 with the Clerk of the Court using the CM/CF system which will send notification of such
4 filing to the following:

5 Donna M. Young
6 Lee Smart, P.S., Inc.
7 1800 One Convention Place
8 701 Pike Street
9 Seattle, WA 98101-3929
10 Tel: (206) 624-7990
11 Email: dmy@leesmart.com
12 *Attorney for Defendant*

13 DATED this 10th day of May, 2018.

14 */s/ Chris P. Reilly*
15 Chris P. Reilly, WSBA No. 25585