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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATIONAL FROZEN FOODS
CORPORATION, a Washington corporation,

Plaintiff,

v.

BERKLEY ASSURANCE COMPANY, an
Iowa corporation; AMWINS BROKERAGE
OF ILLINOIS, a North Carolina Limited
Liability Company; AMWINS BROKERAGE
OF ARIZONA, a Delaware Limited Liability
Company; and AMWINS GROUP LLC, a
Delaware Limited Liability Company,

Defendants.

NO. 2:17-cv-00339 RSM

STIPULATED MOTION AND ORDER
AMENDING DISCOVERY DEADLINES

STIPULATION

The parties, by and through their counsel of record, hereby stipulate and agree to this joint request to the Court to amend certain discovery deadlines contained in the Order Amending Order Setting Trial Date and Related Dates (Dkt. 53). The reasons justifying the proposed amendment are as follows:

- Severe weather on the East Coast forced the cancellation of the 30(b)(6) and individual depositions of Berkley Assurance Corporation that were scheduled to take

1 place in New York the week of July 16. The earliest dates that these depositions can
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3 be rescheduled is for the week of September 3, which is after the current expert
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5 disclosure / report deadline; and
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- 7 • Scheduling issues have arisen with several other fact witness depositions that
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9 necessitate an amendment to the current case schedule in order to allow sufficient
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11 time to complete expert discovery.
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13 The parties therefore stipulate and agree that the case schedule deadlines should be
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15 amended as follows:
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17 Event	18 Current Deadline	19 New Deadline
20 Expert Witness Disclosure/Reports under FRCP 21 26(a)(2)	22 August 8, 2018 [Moved to August 23 22, 2018 pursuant 24 to prior stipulation]	25 September 19, 2018
26 Discovery Motions	27 September 10, 2018	28 October 3, 2018
29 Expert Rebuttal Reports	30 September 21, 31 2018 ¹	32 October 10, 2018
33 Discovery Completed By	34 October 8, 2018	35 October 29, 2018

36 All other case schedule deadlines will remain the same.
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44 ¹ The prior case schedule did not have a rebuttal report deadline. The Federal Rules provide 30 days to disclose
45 rebuttal reports. The parties have stipulated to a shorter deadline for rebuttal reports than what is provided under the
Federal Rules, and therefore ask that this is reflected in the amended case schedule.

1 DATED this 20th day of July, 2018.
2

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11

12 **ORDER**

13 The Court has considered the foregoing stipulation of the parties. It is ORDERED that
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15 the case schedule deadlines be amended as follows:
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19 Event	20 Current Deadline	21 New Deadline
22 Expert Witness Disclosure/Reports under FRCP 23 26(a)(2)	24 August 8, 2018 [Moved to August 25 22, 2018 pursuant 26 to prior stipulation]	27 September 19, 2018
28 Discovery Motions	29 September 10, 2018	October 3, 2018
30 Expert Rebuttal Reports	31 September 21, 2018	October 10, 2018
32 Discovery Completed By	33 October 8, 2018	October 29, 2018

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35 All other case schedule deadlines will remain the same.

36 IT IS SO ORDERED.

37 DATED: July 23, 2018

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39 RICARDO S. MARTINEZ
40 CHIEF UNITED STATES DISTRICT JUDGE
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