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THE HON. JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

EXPANDING ENTERPRISES, LLC, a
Washington limited liability company,

Plaintiff,

vs.

CONTINENTAL WESTERN INSURANCE
COMPANY, an Iowa corporation,

Defendant.

No. 2:17-cv-00484 JLR

AND ORDER

STIPULATED MOTION REGARDING
TIME TO ANSWER AND PROPOSED
ORDER.

JLR

Note on Motion Calendar March 30, 2017

STIPULATION

The parties, by and through their respective attorneys of record, hereby stipulate as follows:

The deadline for Continental Western Insurance Company's Answer has not yet expired. See Fed. R. Civ. P. 81(c)(2) (current deadline based upon removal date). Good cause exists to extend this deadline, because Continental Western Insurance Company requires additional time to provide full Answer to the claims in this matter, and the additional time will allow full answer, will preclude amendment of the Answer, including motions

STIPULATED MOTION AND PROPOSED
ORDER (Cause No. 2:17-cv-00484 JLR) – 1
mmp/LCN6412.234/2512843x



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1 regarding same, and will not delay trial or otherwise prejudice the parties or inconvenience
2 the Court. *See* Fed. R. Civ. P. 6(b)(1). The parties request that the Court order that the
3 deadline for Continental Western Insurance Company's Answer is extended three weeks,
4 from March 31, 2017, to April 21, 2017.

5
6 IT IS SO STIPULATED. The parties move the Court for an Order regarding this
7 deadline.

8 Dated this 30th day of March, 2017.

9
10 WILSON SMITH COCHRAN DICKERSON

11 By *s/ John M. Silk Lisa C. Neal*
12 John M. Silk, WSBA No. 15035
13 Lisa C. Neal, WSBA No. 25686
14 Attorneys for Defendant

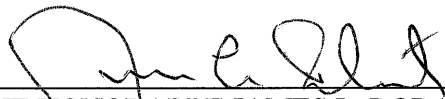
15 MONTGOMERY PURDUE BLANKINSHIP

16
17 By *s/ Andrew R. Chisolm*
18 Andrew R. Chisolm, WSBA No. 30673
19 Attorney for Plaintiff
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ORDER

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3 Based upon the above stipulation, and for good cause shown, it is hereby ORDERED
4 that Continental Western Insurance Company's Answer in this matter is due on April 21,
5 2017. Any deadlines dependent upon the deadline for Answer are also hereby extended to the
6 relevant time period following the filing of the Answer.

7
8 Dated this 30th day of March, 2017.

9
10 
11 _____
12 THE HONORABLE JAMES L. ROBERT

13 Presented by:

14 WILSON SMITH COCHRAN DICKERSON

15 By s/ John M. Silk Lisa C. Neal
16 John M. Silk, WSBA No. 15035
17 Lisa C. Neal, WSBA No. 25686
18 Attorney for Defendant

19 MONTGOMERY PURDUE BLANKINSHIP

20 By s/ Andrew R. Chisolm
21 Andrew R. Chisolm, WSBA No. 30673
22 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

The undersigned certifies that under penalty of perjury under the laws of the State of Washington that on the below date I caused to be served via ECF the foregoing document on:

Attorney for Plaintiff

Andrew R. Chisolm
Montgomery Purdue Blankinship & Austin
5500 Columbia Center
701 Fifth Avenue
Seattle, WA 98104-7096
 Via U.S. Mail
 Via Facsimile: (206) 625-9534
 Via Hand Delivery
 Via Email: achisholm@mpba.com

SIGNED this 30th day of March, 2017, at Seattle, Washington.

s/ Alicia Ossenkop
Alicia Ossenkop