

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LESLIE JACK, individually and as Personal  
Representative of PATRICK JACK; DAVID  
JACK, individually,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants

NO. 2:17-cv-00537-JLR

**DEFENDANT INGERSOLL RAND  
COMPANY AND VELAN VALVE  
CORPORATION'S STIPULATION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME TO EXTEND TO  
TAKE THE DEPOSITION OF EXPERT  
GAIL STOCKMAN**

Counsel for Defendants Ingersoll Rand Company and Velan Valve Corporation and  
counsel for Plaintiffs Leslie Jack and David Jack, hereby stipulate to an extension beyond the  
current discovery cutoff of June 18, 2018 to June, 22, 2018 to conduct the deposition of expert  
Gail Stockman. By agreement Plaintiffs schedule Ms. Stockman's deposition in this matter  
for June 18, 2018. Ms. Stockman is unable to be present as she is testifying at trial in another  
matter.

Ingersoll Rand Company and Velan Valve Corporation has notified all defendants of  
this stipulation and proposed order with no objections.

///

DEFENDANT VELAN VALVE CORPORATION'S  
CORPORATE DISCLOSURE STATEMENT - 1  
No. 2:17-cv-00537-BAT

**GORDON SCULLY  
MANSUKHANI, LLP**  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Dated this 13<sup>th</sup> day of June 2018.

GORDON REES SCULLY  
MANSUKHANI, LLP

s/Mark B. Tuvim  
Mark B. Tuvim, WSBA No. 31909  
Kevin J. Craig, WSBA No. 29932  
Attorney for Ingersoll Rand Company  
And Velan Valve Corporation  
[seasbestos@gordonrees.com](mailto:seasbestos@gordonrees.com)

DEAN OMAR BRANHAM, LLP

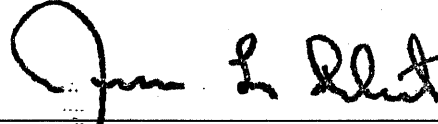
s/Benjamin H. Adams  
Benjamin H. Adam (Pro Hac Vice)  
[badams@dobllp.com](mailto:badams@dobllp.com)

**ORDER**

Based on the foregoing Stipulation, it is hereby ORDERED that the discovery deadline for the deposition of expert Gail Stockman be extended to June 22, 2018.

No other deadlines will be extended.

Dated this 14<sup>th</sup> of June, 2018



HONORABLE JAMES L. ROBART

Presented by:

GORDON REES SCULLY  
MANSUKHANI, LLP

s/Mark B. Tuvim

Mark B. Tuvim, WSBA No. 31909  
Kevin J. Craig, WSBA No. 29932  
Attorneys for Ingersoll Rand Company  
And Velan Valve Corporation  
[seasbestos@gordonrees.com](mailto:seasbestos@gordonrees.com)

DEAN OMAR BRANHAM, LLP

s/Benjamin H. Adams

Benjamin H. Adams (Pro Hac Vice)  
Attorney for Plaintiff  
[badams@dobllp.com](mailto:badams@dobllp.com)

**GORDON SCULLY  
MANSUKHANI, LLP**

701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100

DEFENDANT VELAN VALVE CORPORATION'S  
CORPORATE DISCLOSURE STATEMENT - 3  
No. 2:17-cv-00537-BAT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATE OF SERVICE**

1  
2 The undersigned declares under the penalty of perjury under the laws of the State of  
3 Washington that on this day a true and correct copy of the foregoing document was filed with  
4 the Clerk of the Court served via email on all counsel of record below:  
5

6 **Attorneys for Plaintiffs**

7 Thomas J. Breen  
8 Lucas Garrett  
9 Schroeter Goldmark & Bender  
10 500 Central Building  
11 810 3<sup>rd</sup> Avenue  
12 Seattle, WA 98104-1693  
13 SGBasbestos@sgb-law.com

14 **Attorneys for Plaintiffs**

15 Benjamin H. Adams  
16 Charles W. Branham, III  
17 Dean Omar & Branham, LLP  
18 4343 Finley Avenue, #5  
19 Los Angeles, CA 90027  
20 badams@dobllp.com  
21 jjohnson@dobllp.com

22 **Attorneys for Borg Warner Corporation**

23 Richard D. Ross  
24 Michael Madderra  
25 Selman Breitman LLP  
600 University Street, Suite 1800  
Seattle, WA 98101  
rros@selmanlaw.com  
mmadderra@selmanlaw.com  
asbestoswa@selmanlaw.com

**Attorneys for IMO Industries, Inc.**

Jim Horne  
Gordon Thomas Honeywell LLP  
600 University, Suite 2100  
Seattle, WA 98101-4185  
IMOservice@gth-law.com

CERTIFICATE OF SERVICE - 1

**GORDON REES SCULLY  
MANSUKHANI, LLP**  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100  
Facsimile: (206) 689-2822

1 **Attorneys for Honeywell International Inc.**

2 Mary Z. Gaston  
3 Kristine E. Kruger  
4 Perkins Coie LLP  
5 1201 Third Avenue, Suite 4800  
6 Seattle, WA 98101  
7 [mgaston@perkinscoie.com](mailto:mgaston@perkinscoie.com)  
8 [kkruger@perkinscoie.com](mailto:kkruger@perkinscoie.com)  
9 [HW\\_Asbestos\\_SEA@perkinscoie.com](mailto:HW_Asbestos_SEA@perkinscoie.com)

6 **Attorneys for Flowserve US Inc.**

7 Randy J. Aliment  
8 Marc M. Carlton  
9 Lewis Brisbois Bisgaard & Smith LLP  
10 1111 Third Avenue, Suite 2700  
11 Seattle, WA 98101  
12 [Seattle-asbestos@lewisbrisbois.com](mailto:Seattle-asbestos@lewisbrisbois.com)

10 **Attorneys for Pneumo Abex LLC and Dana Companies, LLC**

11 Diane J. Kero  
12 Gordon Thomas Honeywell  
13 600 University, Suite 2101  
14 Seattle, WA 98101-4185  
15 [service@gth-law.com](mailto:service@gth-law.com)

13 **Attorneys for Union Pacific Railroad Company**

14 Tim D. Wackerbarth  
15 Lane Powell PC  
16 Andrew G. Yates  
17 1420 5<sup>th</sup> Avenue, Suite 4100  
18 Seattle, WA 98101  
19 [asbestos@lanepowell.com](mailto:asbestos@lanepowell.com)  
20 [rmoore@bcslaw.com](mailto:rmoore@bcslaw.com)  
21 [bpartida@bcslaw.com](mailto:bpartida@bcslaw.com)

18 and

19 Robert H. Berkes  
20 Berkes Crane Robinson & Seal LLP  
21 515 S. Figueroa Street, Suite 1500  
22 Los Angeles, CA 90071  
23 [rberkes@bcslaw.com](mailto:rberkes@bcslaw.com)  
24 Ryan T. Moore (Pro Se)  
25 Viiu Spangler Khaer (Pro Se)  
Berkes Crane Robinson & Seal  
515 S. Figueroa Street, Suite 1500  
Los Angeles, CA 90071  
[rmoore@bcslaw.com](mailto:rmoore@bcslaw.com)  
[vspanglerkhare@bcslaw.com](mailto:vspanglerkhare@bcslaw.com)

CERTIFICATE OF SERVICE - 2

**GORDON REES SCULLY  
MANSUKHANI, LLP**  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100  
Facsimile: (206) 689-2822

1 **Attorneys for Vlad Corporation and Crosby Valve, LLC**

2 Ronald C. Gardner  
3 Gardner Trabolsi & Associates PLLC  
4 2200 Sixth Ave., Suite 600  
Seattle, WA 98121  
asbestos@gandtlawfirm.com

5 **Attorneys for Kelsey-Hayes Company, MeadWestvaco Corporation**

6 Katherine M. Steele  
7 Rachel Tallon Reynolds  
8 Bullivant Houser Bailey  
1700 Seventh Avenue, Suite 1810  
Seattle, WA 98101-1618  
asbestos@bullivant.com

9 **Attorneys for Ford Motor Company**

10 Mark J. Fucile  
11 Daniel Reising  
12 Fucile & Reising, LLP  
800 NW 6<sup>th</sup> Avenue, Suite 211  
Portland, OR 97209-3883  
service@frllp.com

13 **Attorneys for Metropolitan Life Insurance Company**

14 Richard Gawlowski  
15 Wilson Smith Cochran Dickerson  
901 Fifth Avenue, Suite 1700  
Seattle, WA 98164-2050  
16 [metlifeasbestos@wscd.com](mailto:metlifeasbestos@wscd.com)

17 **Attorneys for Warren Pumps, Inc.**

18 J. Michael Mattingly  
19 Rizzo Mattingly Bosworth PC  
1300 SW Sixth Avenue, Suite 330  
Portland, OR 97201  
asbestos@rizzopc.com

20 **Attorneys for CBS Corporation, General Electric Co. and Foster Wheeler Energy Corporation**

21 Christopher S. Marks  
22 Erin P. Fraser  
23 Malika Johnson  
24 Tanenbaum Keale LLP  
701 Pike Street, Suite 1575  
Seattle, WA 98101  
seattle.asbestos@tktrial.com

25  
CERTIFICATE OF SERVICE - 3

GORDON REES SCULLY  
MANSUKHANI, LLP  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100  
Facsimile: (206) 689-2822

1 **Pro Hac Attorney for CBS**

2 William D. Harvard  
3 Evert Weathersby Houff  
4 200 Cleveland Road, Suite 6  
5 Bogart, GA 30622  
6 wdharvard@ewhlaw.com  
7 kacook@ewhlaw.com

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
DATED this 13<sup>th</sup> day of June, 2018.

s/Angela M. Kendrick

Angela M. Kendrick

akendrick@gordonrees.com

CERTIFICATE OF SERVICE - 4

**GORDON REES SCULLY  
MANSUKHANI, LLP**  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5100  
Facsimile: (206) 689-2822