

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
26

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

No. 2:17-cv-00537-JLR

PLAINTIFFS' STIPULATION AND
~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME TO RESPOND
TO DEFENDANT FORD MOTOR
COMPANY'S MOTION FOR
SUMMARY JUDGMENT

NOTING DATE: JULY 31, 2018

Plaintiff Leslie Jack, individually and as personal representative of Patrick Jack, and David Jack, ("Plaintiffs") and defendant Ford Motor Company, hereby stipulate to an extension of time for Plaintiffs to file their Response to Ford Motor Company's Motion for Partial Summary Judgment from the current deadline of July 30, 2018 to August 6, 2018.

Ford filed its Motion on July 10, 2018. The remaining defendants all filed their summary judgment motions a week later on July 17, 2018. Per the Court's July 25, 2018 order, Plaintiffs will file one response on many of the common legal issues raised in Ford's motion and those of the other defendants. The parties file the instant stipulation to set a single deadline for that one response.

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE FOR PLAINTIFFS TO
RESPOND TO FORD MOTOR COMPANY'S
MOTION FOR SUMMARY JUDGMENT - 1
(Case No. 2:17-cv-00537-JLR)

SCHROETER, GOLDMARK & BENDER
500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

STIPULATION

1
2 Plaintiffs and defendant Ford Motor Company, by and through their respective
3 counsel of record, hereby stipulate and agree that the deadline for Plaintiffs' Response to
4 Ford Motor Company's Motion for Partial Summary Judgment may be extended from the
5 current deadline of July 30, 2018 to August 6, 2018.

6 DATED this 31st day of July, 2018.

7
8 DEAN OMAR & BRANHAM, LLP

FUCILE & REISING LLP

9
10 By: s/ Benjamin H. Adams
Benjamin H. Adams, CSB No. 272909
11 Attorney for Plaintiffs

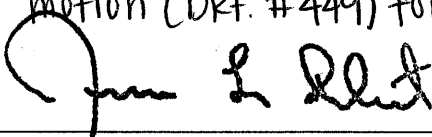
By: s/ Mark Fucile
Mark Fucile, WSBA No. 23736
Attorney for Ford Motor Company

12
13 **ORDER EXTENDING DEADLINE TO RESPOND TO SUMMARY JUDGMENT**

14 The Court having considered the Stipulation by the Plaintiffs and Defendant Ford
15 Motor Company, and being fully advised in the premises, now, therefore hereby
16 ORDERS that the deadline for Plaintiffs to file their Response to Ford Motor Company's
17 Motion for Partial Summary Judgment is extended from the current deadline of July 30,
18 2018 to August 6, 2018.

The court DIRECTS the clerk to renote Ford Motor Company's motion (Dkt. #449) for August 10, 2018.

19
20 DATED this 31st JULY day of ~~August~~, 2018


21
22 THE HONORABLE JAMES L. ROBART

23 Presented by:
24 DEAN OMAR BRANHAM, LLP
25 By: s/ Benjamin H. Adams
Benjamin H. Adams, CSB # 272909
26 Attorneys for Plaintiffs

1 *Approved as to form and content:*

2 FUCILE & REISING LLP

3 By: s/ Mark Fucile

4 Mark Fucile, WSBA No. 23736

5 Attorney for Ford Motor Company

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE FOR PLAINTIFFS TO
RESPOND TO FORD MOTOR COMPANY'S
MOTION FOR SUMMARY JUDGMENT – 3
(Case No. 2:17-cv-00537-JLR)

SCHROETER, GOLDMARK & BENDER
500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2018, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Randy J Aliment randy.aliment@lewisbrisbois.com, annie.kliemann@lewisbrisbois.com

Ronald C Gardner rgardner@gandtlawfirm.com, khensley@gandtlawfirm.com

James Edward Horne jhorne@gth-law.com, imoservice@gth-law.com, kcalkins@gth-law.com

Kristin M Houser houser@sgb-law.com, oneil@sgb-law.com, sgbasbestos@sgb-law.com

Diane J. Kero dkero@gth-law.com, service@gth-law.com

Barry Neal Mesher (Terminated) bnm@bnmesherlaw.com

Michael Edward Ricketts mricketts@gth-law.com, cwallace@gth-law.com,
imoservice@gth-law.com, kcalkins@gth-law.com

William Joel Rutzick rutzick@sgb-law.com, jones@sgb-law.com, liberio@sgb-law.com,
ross@sgb-law.com, scrawford@sgb-law.com, ylitalo@sgb-law.com

G William Shaw bill.shaw@klgates.com, Janet.Lewis2@klgates.com,
Ryan.Groshong@klgates.com, mary.klemz@klgates.com, peggy.mitchell@klgates.com,
phong.hong@klgates.com

Tim D. Wackerbarth wackerbarth@lanepowell.com, docketing-sea@lanepowell.com,
mitchells@lanepowell.com, wallg@lanepowell.com

Chris Robert Youtz chris@sylaw.com, matt@sylaw.com, theresa@sylaw.com

Richard G Gawlowski gawlowski@wscd.com, ossenkop@wscd.com, reyes@wscd.com

Mark J Fucile mark@frllp.com, service@frllp.com, signe@frllp.com

Christopher S Marks cmarks@tktrial.com, asbestos.service@tktrial.com,
mtiegen@tktrial.com

Kevin J Craig kcraig@gordonrees.com, akendrick@grsm.com

Mark B Tuvim mtuvim@gordonrees.com, akendrick@gordonrees.com

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE FOR PLAINTIFFS TO
RESPOND TO FORD MOTOR COMPANY'S
MOTION FOR SUMMARY JUDGMENT - 4
(Case No. 2:17-cv-00537-JLR)

SCHROETER, GOLDMARK & BENDER
500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

1 Mary P Gaston mgaston@perkinscoie.com, HW_Asbestos_SEA@perkinscoie.com,
2 docketsea@perkinscoie.com, jstarr@perkinscoie.com

3 Katherine M. Steele Asbestos@bullivant.com, freida.mason@bullivant.com

4 Charles W Branham, III tbranham@dobllp.com, jjohnson@dobllp.com

5 Richard D Ross rross@bblaw.com, epowell@bblaw.com, mmadderra@bblaw.com

6 Jeffrey M Odom odomj@lanepowell.com, carchanoh@lanepowell.com, [dahlk@lanepowell.com](mailto:carrington-
7 dahlk@lanepowell.com), docketing-sea@lanepowell.com

8 Andrew Gordon Yates yatesa@lanepowell.com, docketing-sea@lanepowell.com,
9 mitchells@lanepowell.com

10 John G Goller jgoller@vonbriesen.com, jmitten@vonbriesen.com,
11 tdahms@vonbriesen.com

12 Jeanne F Loftis jeanne.loftis@bullivant.com, Asbestos-pdx@bullivant.com,
13 alicia.soine@bullivant.com, portlanddocketing@bullivant.com,
14 stephanie.wilken@bullivant.com

15 Rachel Tallon Reynolds asbestos@bullivant.com, elizabeth.pina@bullivant.com,
16 racheltallon@gmail.com, tonyha.davies@bullivant.com

17 Thomas J. Breen breen@sgb-law.com, sgbasbestos@sgb-law.com

18 Marc Marshall Carlton marc.carlton@lewisbrisbois.com, [Seattle-
20 Asbestos@lewisbrisbois.com](mailto:Seattle-
19 Asbestos@lewisbrisbois.com), stacey.miller@lewisbrisbois.com

21 Allen Eraut aeraut@rizzopc.com, recordsmanagement@rizzopc.com

22 Daniel K. Reising dan@frllp.com, service@frllp.com, signe@frllp.com

23 Erin P Fraser efraser@tktrial.com, mtiegen@tktrial.com

24 William D Harvard WDHarvard@ewhlaw.com, kacook@ewhlaw.com

25 Claude Bosworth cbosworth@rizzopc.com, recordsmanagement@rizzopc.com

26 Elizabeth Jean McLafferty mclafferty@sgb-law.com, sgbasbestos@sgb-law.com

Brendan Hanrahan brendan.hanrahan@bullivant.com

Kristine E Kruger kkruger@perkinscoie.com, HW_Asbestos_Sea@perkinscoie.com,

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE FOR PLAINTIFFS TO
RESPOND TO FORD MOTOR COMPANY'S
MOTION FOR SUMMARY JUDGMENT – 5
(Case No. 2:17-cv-00537-JLR)

SCHROETER, GOLDMARK & BENDER
500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

1 docketpor@perkinscoie.com, kristinekruger@gmail.com

2 Malika Johnson mjohnson@tktrial.com, mtiegen@tktrial.com

3 Lucas W.H. Garrett garrett@sgb-law.com, sgbasbestos@sgb-law.com

4 Ryan J Groshong ryan.groshong@klgates.com, anita.spencer@klgates.com

5 Michael Mackenzie Brown mac.brown@bullivant.com, Freida.Mason@bullivant.com

6 Shaun Mary Morgan smorgan@rizzopc.com, recordsmanagement@rizzopc.com

7 Benjamin H. Adams badams@dobllp.com, case@dobllp.com, dsmith-hogan@dobllp.com,
8 jjohnson@dobllp.com

9 Trevor J. Mohr tmohr@gordonrees.com, seaasbestos@gordonrees.com

10 Viiu Spangler Khare vspanglerkhare@bcslaw.com, rcastellanos@bcslaw.com,
11 tmatsumoto@bcslaw.com

12 Ryan T Moore rmoore@bcslaw.com, achohlis@bcslaw.com, cbee@bcslaw.com,
13 nlevonyan@bcslaw.com

14 Lisa W Shirley LShirley@dobllp.com, dsmith-hogan@dobllp.com

15 Carrie S Lin clin@mgmlaw.com

16 Katherine A. Lawler katherine.lawler@nelsonmullins.com,
17 shemeka.eldridge@nelsonmullins.com

18 Robert H Berkes rberkes@bcslaw.com

19 R Thomas Radcliffe tradcliffe@dehay.com, mktippins@dehay.com

20 Jospeh S Pevsner Jospeh.Pevsner@tklaw.com

21 Dated this 31st day of July, 2018, at Seattle, Washington.

22
23 s/ Cameron Colbo

24 Cameron Colbo, Legal Assistant
25 Schroeter, Goldmark & Bender
26 810 Third Avenue, Suite 500
Seattle, WA 98104
(206) 622-8000
colbo@sgb-law.com

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE FOR PLAINTIFFS TO
RESPOND TO FORD MOTOR COMPANY'S
MOTION FOR SUMMARY JUDGMENT – 6
(Case No. 2:17-cv-00537-JLR)

SCHROETER, GOLDMARK & BENDER
500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305