

HONORABLE JAMES L. ROBERT

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

STIPULATION AND ORDER EXCUSING TOM
RADCLIFFE FROM ATTENDANCE AT THE
SEPTEMBER 17, 2018 PRETRIAL
CONFERENCE

DCO RECITATIONS

DCo's primary trial counsel for this case R. Thomas Radcliffe was admitted Pro Hac Vice on July 19, 2018 [DKT 528]. Prior to the change in the trial date from October 15, 2018 to October 1, 2018 Mr. Radcliffe's family had planned and paid for a vacation out of the country from September 15 to 29, 2018, scheduled with the plan that Mr. Radcliffe would attend the Pretrial conference with the Court on October 1, 2018. The

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ATTENDANCE AT THE SEPTEMBER 17, 2018 PRETRIAL CONFERENCE - 1

of 5
(2:17-cv-00537 JLR)
[4838-8071-3072]

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
ONE UNION SQUARE
600 UNIVERSITY, SUITE 2100
SEATTLE, WASHINGTON 98101-4185
(206) 676-7500 - FACSIMILE (206) 676-7575

1 change in trial date resulted in a change in the Pretrial Conference to September 17,
2 2018, that necessitates this request.

3 Local DCo counsel Michael Ricketts who will try this case with Mr. Radcliffe and
4 Diane Kero will attend the Pretrial conference in Mr. Radcliffe's absence. Both have been
5 involved in this case from the beginning. They will be responsible to represent DCo at the
6 conference and to convey all information and rulings to Mr. Radcliffe.
7

8 STIPULATION

9 Defendant DCo, LLC f/k/a Dana Companies, LLC ("DCo") requests this Court
10 excuse the personal attendance of R. Thomas Radcliffe, National Counsel for the
11 September 17, 2018 Pretrial Conference. Before submitting this request to the Court
12 DCo counsel obtained the agreement of all parties to this request.
13

14 Dated: August 24, 2018.

Dated: August 24, 2018.

15 SCHROETER GOLDMARK & BENDER

GORDON THOMAS HONEYWELL LLP

16
17 By /s/ Thomas J. Breen
18 Thomas J. Breen, WSBA No. 34574
19 Counsel for Plaintiff

By /s/ Diane J. Kero
Diane J. Kero, WSBA NO. 11874
Counsel for Defendant DCo, LLC f/k/a
Dana Companies, LLC

20 Dated: August 24, 2018.

Dated: August 24, 2018.

21 DEAN OMAR BRANHAM LLP

BENNETT BIGELOW & LEEDOM PS

22
23 By /s/ Benjamin H. Adams
24 Benjamin H. Adams, *Pro Hac Vice*
25 Counsel for Plaintiff

By /s/ Richard D. Ross
Richard D. Ross, WSBA No. 34502
Counsel for Defendant BorgWarner Morse
Tec LLC

26 STIPULATION AND ORDER EXCUSING TOM RADCLIFFE FROM
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1 Dated: August 24, 2018.

Dated: August 24, 2018.

2 GARDNER TRABOLSI & ASSOCIATES

LANE POWELL PC

3
4 By /s/ Ronald Gardner
5 Ronald Gardner, WSBA No. 9270
6 Counsel for Defendant Viad Corporation

By /s/ Jeffrey M. Odom
Jeffrey M. Odom, WSBA No. 36168
Counsel for Union Pacific Railroad Co.

6 Dated: August 24, 2018.

Dated: August 24, 2018.

7 PERKINS COIE LLP

FUCILE & REISING LLP

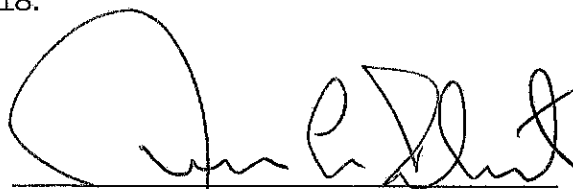
9 By /s/ Kristine E. Kruger
10 Kristine E. Kruger, WSBA No. 44612
11 Counsel for Honeywell International, Inc.

By /s/ Dan Reising
Mark J. Fucile, WSBA No. 23736
Daniel K. Reising, WSBA No. 41175
Counsel for Ford Motor Company

12
13 ORDER

14 IT IS NOW ORDERED that attorney R. Thomas Radcliffe, National Counsel for DCo,
15 LLC f/k/a Dana Companies, LLC is excused from attending the September 17, 2018
16 Pretrial Conference.

17 DATED this ²⁴27 day of August, 2018.

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21 
22 HONORABLE JAMES L. ROBERT
23 UNITED STATES DISTRICT JUDGE

22 Presented By:

23 GORDON THOMAS HONEYWELL LLP

24 By /s/ Diane J. Kero
25 Diane J. Kero, WSBA No. 11874
26 Attorney for Defendant DCo, LLC f/k/a
Dana Companies, LLC

STIPULATION AND ORDER EXCUSING TOM RADCLIFFE FROM
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1 Approved as to Form; Notice of Presentation
Waived

2
3 SCHROETER GOLDMARK & BENDER

4 By /s/ Thomas J. Breen
5 Thomas J. Breen, WSBA No. 34574
6 Counsel for Plaintiff

7 DEAN OMAR BRANHAM LLP

8 By /s/ Benjamin H. Adams
9 Benjamin H. Adams, *Pro Hac Vice*
10 Counsel for Plaintiff

11 BENNETT BIGELOW & LEEDOM PS

12 By /s/ Richard D. Ross
13 Richard D. Ross, WSBA No. 34502
14 Counsel for Defendant BorgWarner Morse Tec LLC

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16 By /s/ Ronald Gardner
17 Ronald Gardner, WSBA No. 9270
18 Counsel for Defendant Viad Corporation

19 LANE POWELL PC

20 By /s/ Jeffrey M. Odom
21 Jeffrey M. Odom, WSBA No. 36168
22 Counsel for Union Pacific Railroad Co.

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26
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PERKINS COIE LLP

By /s/ Kristine E. Kruger
Kristine E. Kruger, WSBA No. 44612
Counsel for Honeywell International, Inc.

FUCILE & REISING LLP

By /s/ Daniel K. Reising
Mark J. Fucile, WSBA No. 23736
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