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Hon, Robert S. Lasnik

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ALICE MIKELSEN, Surviving Spouse, and SUSAN PAGE, as Personal Representative for ARTHUR MELVIN MIKELSEN, Deceased,

Plaintiffs,

.

CORPORATION, et al.,

Defendants.

No. 17-cv-00700-RSL

STIPULATION AND PROPOSED OF ORDER TO EXTEND DEADLINE FOR DISCLOSURE OF EXPERT INFORMATION

## **STIPULATION**

Pursuant to the Court's *Minute Order Setting Trial Date & Related Dates* (Dkt. #39), the deadline for parties to disclose expert information under Fed. R. Civ. P. 26(a)(2) is December 6, 2017. The Parties<sup>1</sup> herein agree and request that the Court enter an order extending the deadline for a period of two (2) weeks, up to and including <u>December 20</u>, 2017.

Good cause exists for such an extension because Plaintiffs' counsel was recently informed that their expert, Everett Cooper, is out of the country and will not return until

STIPULATION AND <del>[PROPOSE</del>D] ORDER TO EXTEND DEADLINE FOR DISCLOSURE OF EXPERT INFORMATION

- 1 (Case No. 17-cv-00700-RSL) 631460.docx SCHROETER, GOLDMARK & BENDER 500 Central Building • 810 Third Avenue • Seattle, WA 98104 Phone (206) 622-8000 • Fax (206) 682-2305

Plaintiffs have tentatively agreed to settlement with certain defendants (Asbestos Corporation Ltd., Ingersoll Rand Company, Uniroyal, Inc., and Goulds Pumps, Inc.). These defendants are not included in the stipulation. Once the settlements have been finalized, counsel will file notices of settlement with the Court.

December 5, 2017, which will not allow Mr. Cooper sufficient time to prepare a report for 2 disclosure under the current deadline of December 6, 2017. All parties are in agreement that 3 such an extension is warranted. 4 ORDER 5 The Court, having reviewed the foregoing stipulation of counsel for all parties, and 6 being fully advised in the premise herein, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for 8 disclosure of expert reports and information under Fed. R. Civ. P. 26(a)(2) is extended for a 9 period of two (2) weeks, up to and including December 20, 2017. DATED this **2** (st day of November, 2017 10 11 12 13 United States District Court Judge 14 Respectfully submitted on behalf of and approved by all counsel. 15 s/Lucas Garrett KRISTIN HOUSER, WSBA #7286 16 LUCAS GARRETT, WSBA #38452 17 SCHROETER GOLDMARK & BENDER 810 Third Avenue, Suite 500 18 Seattle, WA 98104 sgbasbestos@sgb-law.com; houser@sgb-law.com; garrett@sgb-law.com 19 Counsel for Plaintiffs 20 21 s/G. William Shaw G. WILLIAM SHAW, WSBA #8573 22 **K&L GATES** 925 Fourth Avenue, Suite 2900 23 Seattle, WA 98104 se.asbestos@klgates.com 24 Counsel For: Crane Co. 25 STIPULATION AND [PROPOSED] ORDER 26 SCHROETER, GOLDMARK & BENDER TO EXTEND DEADLINE FOR 500 Central Building • 810 Third Avenue • Seattle, WA 98104 DISCLOSURE OF EXPERT Phone (206) 622-8000 • Fax (206) 682-2305 INFORMATION

(Case No. 17-cv-00700-RSL)

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