

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

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SHANE LAFFERTY,  
  
Plaintiff,  
  
vs.  
  
CHRISTOPHER LIU et al.  
  
Defendants.

No. 2:17-cv-00749-RSM  
  
STIPULATED MOTION AND ORDER  
TO CONTINUE TRIAL DATE AND  
MODIFY PRETRIAL DEADLINES

**STIPULATION**

Defendant David Heenan, by and through his counsel Stephen T. LeCuyer, Thomas B. Nedderman, and John A. Safarli, Defendant Hudson Insurance Company (“Hudson”), by and through its counsel William W. Spencer, and Plaintiff Shane Lafferty, by and through his counsel William J. Johnston (collectively, “the Parties”) respectfully request this Court continue the trial date that is currently set for February 5, 2018, Dkt. #10, and modify the pretrial deadlines accordingly.

This matter was originally filed in Whatcom County Superior Court on March 6, 2017.

STIPULATED MOTION AND ORDER TO  
CONTINUE TRIAL DATE AND MODIFY  
PRETRIAL DEADLINES - 1

No. 2:17-CV-00749-RSM

FLOYD, PFLUEGER & RINGER P.S.  
200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

1 The Washington State Office of the Insurance Commissioner was served with the summons and  
2 complaint on April 17, 2017, accepted service, and forwarded copies to Hudson, which were  
3 received on April 26, 2017. Hudson then removed this matter, and this Court set trial for  
4 February 5, 2018. Dkt. #10. Heenan was not served until July 7, 2017—the day after the trial  
5 date was set. Heenan’s counsel have since appeared. Dkt. #11, #12, #14.

6 Heenan’s counsel have discussed a new trial date with counsel for Hudson and for  
7 Plaintiff. The Parties all consent to a new trial date. A new case schedule would provide Heenan  
8 with time to comply with pretrial deadlines, including expert disclosure under Fed. R. Civ. P.  
9 26(a)(2), which is currently due on August 9, 2017.

10 Accordingly, the Parties respectfully request that this Court continue the trial date until  
11 May 2018, and modify the pretrial dates accordingly.

12 RESPECTFULLY SUBMITTED THIS 31<sup>st</sup> day of July, 2017.

13 FLOYD, PFLUEGER & RINGER, P.S.

14 By: s/ Thomas B. Nedderman

15 Thomas B. Nedderman

16 tnedderman@floyd-ringer.com

17 John A. Safarli

18 jsafarli@floyd-ringer.com

19 200 W. Thomas Street, Suite 500

20 Seattle, WA 98119-4296

21 Tel (206) 441-4455

22 Fax (206) 441-8484

23 OFFICE OF THE TRIBAL ATTORNEY

24 SWINOMISH INDIAN TRIBAL COMMUNITY

25 By: s/ Stephen T. LeCuyer

Stephen T. LeCuyer

slecuyer@swinomish.nsn.us

11404 Moorage Way

La Conner, WA 98257

Tel (360) 466-1058

STIPULATED MOTION AND ORDER TO  
CONTINUE TRIAL DATE AND MODIFY  
PRETRIAL DEADLINES - 2

No. 2:17-CV-00749-RSM

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500

SEATTLE, WA 98119-4296

TEL 206 441-4455

FAX 206 441-8484

1 *Attorneys for Defendant David Heenan*

2 MURRAY DUNHAM & MURRAY

3 By: *William W. Spencer*

4 William W. Spencer  
5 william@murraydunham.com  
6 P.O. Box 9844  
7 200 W. Thomas St., Suite 500  
8 Seattle, WA 98109-0844  
9 Tel (206) 622-2655

10 *Attorney for Hudson Insurance Company*

11 WILLIAM J. JOHNSTON

12 By: s/ William J. Johnston

13 William J. Johnston  
14 wjtj47@gmail.com  
15 401 Central Ave.  
16 Bellingham, WA 98225  
17 Tel (360) 676-1931  
18 Fax (360) 676-1931

19 *Attorney for Plaintiff Shane Lafferty*

20 STIPULATED MOTION AND ORDER TO  
21 CONTINUE TRIAL DATE AND MODIFY  
22 PRETRIAL DEADLINES - 3

23 No. 2:17-CV-00749-RSM

FLOYD, PFLUEGER & RINGER P.S.

24 200 W. THOMAS ST., SUITE 500  
25 SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

1 **ORDER**

2 The trial date is continued from February 5, 2018, to May 7, 2018, and the pretrial  
3 deadlines will be adjusted accordingly.  
4

5 IT IS SO ORDERED.  
6

7 Dated this 1 day of August 2017.

8 

9 RICARDO S. MARTINEZ  
10 CHIEF UNITED STATES DISTRICT JUDGE  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

25 STIPULATED MOTION AND ORDER TO  
CONTINUE TRIAL DATE AND MODIFY  
PRETRIAL DEADLINES - 4

No. 2:17-CV-00749-RSM

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484