

Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT
WESTERN DIVISION OF WASHINGTON
AT SEATTLE**

LISA MOORE, an individual,

No. 2:17-cv-00800 TSZ

Plaintiff,

**JOINT STIPULATION AND ORDER
FOR TRIAL CONTINUANCE AND
NEW SCHEDULING ORDER**

v.

THE BOEING COMPANY, a Delaware Corporation; BOEING DEFENSE SPACE & SECURITY, a division of BOEING, business entity, form unknown; BOEING NETWORK & SPACE SYSTEMS, a part of BOEING DEFENSE, SPACE & SECURITY, a business entity, form unknown, and DOES 1-10,

Defendants.

IT IS HEREBY STIPULATED by and between Beverly G. Grant and Jeffery D. Bradley of Beverly Grant Law Firm, P.S., counsel for Plaintiff herein and Ethel Johnson, Karen Y. Cho, M. Nicole Beckley of Morgan Lewis & Bockius, LLP and Laurence Shapero of Ogletree Deakins Nash Smoak & Stewart, counsel for Defendants herein, that the trial of the above entitled matter may be continued from November 4, 2019 to any date after July 31, 2020 and a proposed continuance of remaining case deadlines as follows:

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JOINT STIPULATION AND ORDER
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Beverly Grant Law Firm, P.S.
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Description	Current Dates	Proposed Dates	New Dates By Order of the Judge
Discovery Motions deadline			February 6, 2020
Discovery Completed by	July 8, 2019	March 12, 2020	March 12, 2020
Rebuttal Expert Deadline	July 26, 2019	March 26, 2020	March 26, 2020
Expert Discovery Cutoff	August 9, 2019	April 10, 2020	April 10, 2020
Dispositive motions deadline	August 8, 2019	April 17, 2020	April 16, 2020
Deadline for filing motions related to expert testimony (e.g., Daubert motions)	August 22, 2019	May 1, 2020	April 23, 2020
Motion in limine deadline	October 1, 2019	June 12, 2020	July 23, 2020
Agreed pretrial order due	October 15, 2019	June 26, 2020	August 7, 2020
Voir dire/jury instructions/trial briefs	October 15, 2019	June 26, 2020	August 7, 2020
Pretrial conference	October 25, 2019 at 11:00 am	TBD	August 14, 2020 at 1:30 p.m.

The primary reasons necessitating continuance are because the Plaintiff's physician, Dr. Soorani, of Los Angeles, CA, has indicated that Plaintiff's mental state will be jeopardized if her deposition were to be taken now and he requests that Plaintiff's deposition be deferred at a minimum of four (4) to six (6) months. Dr. Soorani further recommends that Plaintiff's deposition be broken into two days, rather than a full day. Further, Plaintiff's counsel, Beverly Grant, has only recently substituted in as counsel of record for Plaintiff, and Ms. Grant has another trial scheduled for the same date as the trial in this matter. Ms. Grant's other trial is scheduled to commence on November 4, 2019, in the matter of Brown v. State of Washington, et al, Case No. 3:18-cv-05647-RBL.

Based on Plaintiff's counsel and Dr. Soorani's representations about Plaintiff's medical condition and Plaintiff's counsel's conflict, the parties have agreed to: (1) accept the recommendation by Plaintiff's physician; (2) defer further discovery until Plaintiff's deposition

1 is taken; (3) limit discovery to the retaliation claim only; and (4) enter into good faith settlement
2 negotiations with the assistance of a mediator while waiting for Plaintiff to get well enough to
3 participate in the taking of her deposition.

4 Stipulated to this 10th day of July 2019.

5 BEVERLY GRANT LAW FIRM, P.S.

MORGAN LEWIS & BOCKIUS

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By: /s/ Ethel J. Johnson

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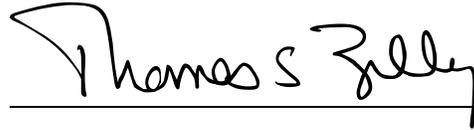
ORDER

28 This matter having come by way of stipulation by counsel, it is HEREBY

29 ADJUDGED, DECREED and ORDERED that:

- 30 1). The Motion for Stipulation for Trial Continuance, docket no. 86, is Granted;
- 31 2). The trial in this matter shall be set for August 24, 2020;
- 32 3). The case schedule deadlines are continued as listed above.

1 DATED this 15th day of July 2019.

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3 

4 Thomas S. Zilly
5 United States District Judge

6 Presented by:

Approved as to form:

7 BEVERLY GRANT LAW FIRM, P.S.

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