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THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL MOI, an individual,

Plaintiff,

v.

CHIHULY STUDIO, INC., a Washington
corporation; DALE CHIHULY,
individually and as a married person;
LESLIE CHIHULY, individually and as a
married person,

Defendants.

CHIHULY, INC., a Washington
corporation; DALE CHIHULY,
individually,

Counterclaim-
Plaintiffs,

v.

MICHAEL MOI, an individual,

Counterclaim-
Defendant.

No. 2:17-cv-00853 RSL

JOINT MOTION TO EXTEND NON-
TRIAL DEADLINES

NOTE ON MOTION CALENDAR:
October 31, 2018

JOINT MOTION TO EXTEND NON-TRIAL
DEADLINES (NO. 2:17-CV-00853 RSL) – i

23641-0040/141816352.1

Perkins Coie LLP
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1 The parties jointly move the Court to extend two dates on the current case schedule (Dkt.
2 #75) – the expert disclosure deadline and the discovery deadline – in order to allow the parties to
3 complete the necessary fact and expert discovery in an orderly fashion. This request will not
4 impact the trial date, the deadline for filing dispositive motions, or any other dates on the current
5 case schedule.
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10 This case involves a dispute over rights to and in thousands of artistic works created over
11 a 15-year period. On the current case calendar, expert witness reports are due on November 7,
12 2018, discovery closes on January 6, 2019, summary judgment motions are due on February 5,
13 2019, and trial is set for May 6, 2018.
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19 In support of their claims and defenses, the parties have exchanged written discovery,
20 including conferring about and supplementing various written responses. The parties have also
21 each produced documents in response to initial document production requests. Plaintiff Moi has
22 propounded additional discovery requests, the responses to which are currently due in late
23 November. Defendant Chihuly anticipates soon propounding additional discovery requests. The
24 parties have communicated about deposition scheduling, although no depositions have yet taken
25 place.
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32 To allow the parties to complete the fact discovery necessary to allow their experts to
33 complete their expert analyses and reports, the parties hereby respectfully request that the Court
34 extend (1) the expert disclosure deadline, from November 7 to December 19, 2018 and (2) the
35 discovery deadline, from January 6 to February 5, 2019. No other dates on the current case
36 calendar would be impacted.
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43 Good cause exists because, as shown above, the parties have demonstrated their diligence
44 in pursuing the discovery required to support their claims and defenses, are cooperating with
45 each other in that regard, and require only a modest extension of two deadlines, neither of which
46 impact court filing or trial dates, in order to ensure sufficient time to complete fact and expert
47 discovery.
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JOINT MOTION TO EXTEND NON-TRIAL
DEADLINES (NO. 2:17-CV-00853 RSL) – 1

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RESPECTFULLY SUBMITTED this 31st day of October, 2018.

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Attorneys for Defendants Chihuly, Inc., Dale
Chihuly, and Leslie Chihuly and
Counterclaim-Plaintiffs Chihuly, Inc. and Dale
Chihuly

ORDER

It is so ordered.

DATED this 1st day of November 2018.



Robert S. Lasnik
United States District Judge