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HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILLIAM CASHEL, an individual,  
  
Plaintiff,  
  
v.  
  
GEMALTO, INC., a Delaware corporation;  
and GEMALTO/SAFENET, INC., a Maryland  
corporation,  
  
Defendants.

Case No. 2:17-cv-01002-TSZ

STIPULATED MOTION AND ORDER TO  
EXTEND PRETRIAL DEADLINES

**I. MOTION**

Plaintiff William Cashel and Defendants Gemalto, Inc. and Gemalto/Safenet, Inc. hereby stipulate and jointly move the Court to extend the following pre-trial deadlines:

1. Deadline for change in trial date set for February 20, 2018 to July 31, 2018;
2. Deadline to complete discovery currently set for August 13, 2018 to September 21, 2018;
3. Deadline to file dispositive motions currently set for September 13, 2018 to October 5, 2018.

///

1 The parties are diligently working through early discovery issues in this case but need  
2 additional time to complete discovery and to file any motions on issues that cannot be resolved by  
3 the parties. This extension is needed due to plaintiff's limited availability, the fact that plaintiff's  
4 counsel was unavailable for the completion of discovery between February 1, 2018 and May 31,  
5 2018 because she was running for office in the State of Oregon, and the unavailability of defendants'  
6 counsel due to a family medical procedure. The parties therefore jointly move to extend pretrial  
7 deadlines according to the list above.

8 **DATED:** July 20, 2018.

9 **HKM EMPLOYMENT ATTORNEYS LLP**

**OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.**

10 By: *s/ Shemia Fagan*

11 Shemia Fagan, WSBA No. 49342

12 Email: sfagan@hkm.com

13 1607 NE 41<sup>st</sup> Avenue

14 Portland, OR 97232

15 Telephone: (503) 400-7423

16 Facsimile: (503) 345-0806

17 *Attorneys for Plaintiff William Cashel*

By: *s/ Adam T. Pankratz*

Adam T. Pankratz, WSBA No. 50951

Email: adam.pankratz@ogletree.com

1201 Third Avenue, Suite 5150

Seattle, WA 98101

Telephone: (206) 693-7057

Facsimile: (206) 693-7058

*Attorneys for Defendants*

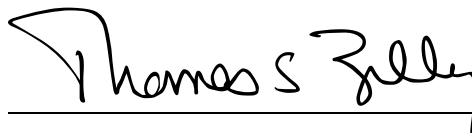
## 18 II. ORDER

19 Having reviewed the Stipulation, IT IS SO ORDERED that the following pretrial deadlines be  
20 extended:  
21

- 22 1. Deadline to complete discovery currently set for August 13, 2018, to September 14,  
23 2018;
- 24 2. Deadline to file dispositive motions currently set for September 13, 2018, to  
25 September 27, 2018.

1 All other deadlines and requirements imposed by the Court's Minute Order Setting Trial Date  
2 and Related Dates, docket no. 11, shall remain unchanged.

3 DATED this 26th day of July, 2018.

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6 Thomas S. Zilly  
United States District Judge