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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SENIOR HOUSING ASSISTANCE  
GROUP,

Plaintiff,

v.

AMTAX HOLDINGS 260, LLC, et al.,

Defendants.

AMTAX HOLDINGS 260, LLC, et al.,

Counter-Plaintiffs,

v.

SENIOR HOUSING ASSISTANCE  
GROUP, et al.,

Counter-Defendants.

No. 2:17-cv-01115-RSM

**STIPULATION AND ORDER TO  
CONTINUE TRIAL DATE AND  
RELATED DATES**

1 Plaintiff and Counter-Defendant Senior Housing Assistance Group; Defendants  
2 AMTAX/Protech AMTAX Holdings 260, LLC, Protech Holdings W, LLC, AMTAX Holdings  
3 259, LLC, AMTAX Holdings 261, LLC, AMTAX Holdings 258, LLC, AMTAX Holdings 257,  
4 LLC, AMTAX Holdings 164, LLC, Protech 2002-A, LLC, AMTAX Holdings 109, LLC, and  
5 Protech 2001-B, LLC; and Counter-Defendants Senior Housing Assistance Corporation, Steel  
6 Lake Enterprises, LLC, Lakewood Meadows Enterprises, LLC, Lynnwood Retirement Living,  
7 LLC, and Woodlands Associates, LLC (collectively the “Parties”), by and through their counsel  
8 of record, stipulate and agree as follows:

9 WHEREAS, the Court entered a scheduling order on October 11, 2017 (the “Scheduling  
10 Order”) setting forth a trial date and related dates;

11 WHEREAS, the Scheduling Order provides that the trial will begin on January 15, 2019;

12 WHEREAS, on June 25, 2018, the Court extended the deadline for disclosure of expert  
13 testimony under Federal Rule of Civil Procedure 26(a)(2) from July 19, 2018 to August 20,  
14 2018;

15 WHEREAS, in light of scheduling issues that have arisen, the Parties desire a further  
16 continuance of the expert disclosure deadline from August 20, 2018 to September 7, 2018;

17 WHEREAS, the Parties also desire to extend the trial date and related dates to  
18 accommodate the later expert disclosure deadline and to ensure adequate time to prepare any  
19 motions related to discovery, dispositive motions, and motions in limine;

20 THEREFORE, subject to the approval of the Court, the Parties hereby stipulate and agree  
21 that:

- 22 • The deadline for disclosure of expert testimony under FRCP 26(a)(2) provided for in  
23 the Court’s June 25, 2018 order shall be continued from August 20, 2018 to  
24 September 7, 2018;
- 25 • The deadline for filing motions related to discovery shall be continued from August  
26 20, 2018 to September 24, 2018;

- 1 • The deadline for completion of discovery shall be continued from September 17,  
2 2018 to October 22, 2018;
- 3 • The deadline for filing dispositive motions shall be continued from October 17, 2018  
4 to November 21, 2018;
- 5 • The deadline for mediation per Local Civil Rule 29.1(c)(3), if requested, shall be  
6 continued from December 3, 2018 to January 7, 2019;
- 7 • The deadline for filing motions in limine shall be continued from December 18, 2018  
8 to January 22, 2019;
- 9 • The deadline for filing an agreed pretrial order shall be continued from January 3,  
10 2019 to February 7, 2019;
- 11 • The deadline for filing Trial briefs, proposed voir dire questions, jury instructions,  
12 neutral statement of the case, and trial exhibits shall be continued from January 10,  
13 2019 to February 14, 2018; and
- 14 • The trial date shall be continued from January 15, 2019 to February 19, 2019.

15 RESPECTFULLY SUBMITTED this 15th day of August 2018.

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8 Holdings 164, LLC, Protech 2002-A, LLC,  
9 AMTAX Holdings 109, LLC, and Protech  
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Attorney for Steel Lake Enterprises, LLC;  
Lakewood Meadows Enterprises, LLC;  
Lynnwood Retirement Living, LLC; and  
Woodlands Associates, LLC

IT IS SO ORDERED this 16<sup>th</sup> day of August 2018.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE