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Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

COSTCO WHOLESALE CORPORATION,

Civil Action No. 2:17-cv-01212-RSL

Plaintiff,

STIPULATION MOTION AND

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ARROWOOD INDEMNITY COMPANY,

[PROPOSED] ORDER TO CONTINUE CERTAIN PRETRIAL DEADLINES

Defendant.

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Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff Costco Wholesale Corporation ("Costco") and Defendant Arrowood Indemnity Company ("Arrowood"), by and through their attorneys of record, hereby submit this Stipulated Motion and [Proposed] Order to Continue Certain Pretrial Deadlines. The parties have met and conferred, and submit this Stipulated Motion in good faith.

DISCUSSION

By its Minute Order Setting Trial Date & Related Dates (ECF No. 13), the Court set this matter for trial on November 5, 2018 and also established a case schedule of pretrial deadlines. To date, the Parties have engaged in substantial written discovery and are in the process of scheduling depositions in this matter. Arrowood has produced all responsive, non-privileged and non-protected documents in its possession. Costco has thus far produced 10 document production sets on a rolling basis and has agreed to continue its production as expeditiously as reasonably possible.

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STIPULATED MOTION AND PROPOSEDLORDER TO
CONTINUE CERTAIN PRETRIAL DEADLINES (2:17-cv-01212-RSL) - 1

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Deadline	Prior Deadline	Proposed Deadline	
Last Day to Amend Pleadings	5/9/18	6/20/18	
Reports from Expert Witnesses	5/9/18	6/20/18	
Discovery Cutoff	7/8/18	8/20/18	
Dispositive Motions	8/7/18	9/4/18	

In light of the upcoming pretrial deadlines, the Parties stipulate and jointly move the Court

for a continuance of certain pretrial deadlines for purposes of completing depositions and the

The Parties do not request that the Court continue the trial date or any other dates unless specified herein. Accordingly, the Parties respectfully request that this Stipulated Motion be approved and that the Court agree to continue the pretrial deadlines specified herein.

IT IS SO STIPULATED THIS 18th day of April, 2018.

production of documents by Costco, as follows:

DATED: April 18, 2018 CLYDE & CO US LLP

/s/ Alexander E. Potente

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Attorneys for Defendant
ARROWOOD INDEMNITY COMPANY

DATED: April 18, 2018

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STIPULATED MOTION AND [PROPOSED] ORDER TO CONTINUE CERTAIN PRETRIAL DEADLINES (2:17-cv-01212-RSL) - 3

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STIPULATED MOTION AND [PROPOSED] ORDER TO

CONTINUE CERTAIN PRETRIAL DEADLINES (2:17-cv-01212-RSL) - 4

ORDER

IT IS HEREBY ORDERED that this Stipulated Motion to continue certain pretrial deadlines is GRANTED. The new dates for the pretrial deadlines are as follows:

Deadline	Prior Deadline	New Deadline
Last Day to Amend Pleadings	5/9/18	6/20/18
Reports from Expert Witnesses	5/9/18	6/20/18
Discovery Cutoff	7/8/18	8/20/18
Dispositive Motions	8/7/18	9/4/18

All other dates remain the same as set forth in the Court's Minute Order Setting Trial Date & Related Dates (ECF No. 13).

DATED this

Honorable Robert S. Lasnik United States District Judge

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