

1 THE HONORABLE RICARDO S. MARTINEZ
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In the matter of the Complaint of F/V
12 MEMORIES, LLC for Exoneration from or
13 Limitation of Liability

14 IN ADMIRALTY

15 NO. 2:17-cv-01296 RSM

16 PLAINTIFF'S MOTION AND ORDER RE:
17 SECURITY

18 COMES NOW, Plaintiff F/V Memories, LLC, owner of the vessel F/V MEMORIES,
19 Official No. 251934, and moves for entry of an Order directing it to post security under Rule F(1)
20 of the Supplemental Rules for Admiralty & Maritime Claims and Local Admiralty Rule 120(b).

21 Rule F(1) of the Supplemental Rules for Admiralty & Maritime Claims requires the
22 plaintiff in a Limitation of Liability action to post security in a sum equivalent to the plaintiff's
23 interest in the vessel along with interest at the rate of 6% per annum and costs. Local Admiralty
24 Rule 120, subpart (b), states that the amount of security for costs under Rule F(1) shall be \$500.00.

25 Plaintiff seeks to post the attached Letter of Undertaking, Exhibit A, whereby, in the event
a final judgment is entered in favor of the claimants, plaintiff's Protection and Indemnity
Underwriters agree to pay up to \$249,000, a sum equal to plaintiff's interest in the vessel, as per
the Declaration of Dave Eriksen in Support of FV Memories, LLC's Complaint for Exoneration

PLAINTIFF'S MOTION AND ORDER RE: SECURITY - 1

Cause No. 2:17-cv-01296 RSM

LAW OFFICES
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1 From or Limitation of Liability [Docket No. 2], plus interest at 6% per annum and costs in any said
2 final decree, or any lesser amount decreed by the Court or settled between the parties.

3 DATED this _____ day of September, 2017.

4 HARRIGAN LEYH FARMER & THOMSEN LLP

5 By _____

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Counsel for Plaintiff

15 **ORDER**

17 Based upon Plaintiff's Motion Re: Security, it is hereby ORDERED that, pursuant to Rule
18 F(1) of the Supplemental Rules for Admiralty & Maritime Claims and Local Admiralty Rule
19 120(b), Plaintiff shall file with the Court a Letter of Undertaking in the form attached as Exhibit A.

20 DATED this 19 day of September 2017.

22 
23 RICARDO S. MARTINEZ
24 CHIEF UNITED STATES DISTRICT JUDGE
25

1 Presented by:

2 HARRIGAN LEYH FARMER & THOMSEN LLP

3 By _____

4 Charles Jordan, WSBA #19206

5 Michelle Buhler, WSBA #16235

of Attorneys for Plaintiff