

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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

IN ADMIRALTY

NO. 2:17-cv-01296 RSM

PLAINTIFF'S MOTION AND ORDER RE:
SECURITY

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

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

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

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 _____
6 Charles S. Jordan, WSBA #19206
7 999 Third Avenue, Suite 4400
8 Seattle, WA 98104
9 T: 206-623-1700
F: 206-623-8717
Email: chipj@harriganleyh.com
Counsel for Plaintiff

10 By _____
11 Michelle Buhler, WSBA #16235
12 999 Third Avenue, Suite 4400
13 Seattle, WA 98104
14 T: 206-623-1700
15 F: 206-623-8717
16 Email: michelleb@harriganleyh.com
Counsel for Plaintiff

17 **ORDER**

18 Based upon Plaintiff's Motion Re: Security, it is hereby ORDERED that, pursuant to Rule
19 F(1) of the Supplemental Rules for Admiralty & Maritime Claims and Local Admiralty Rule
20 120(b), Plaintiff shall file with the Court a Letter of Undertaking in the form attached as Exhibit A.

21 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

Michelle Buhler, WSBA #16235

5 *of Attorneys for Plaintiff*