

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ARLENE M. BROWN,

Plaintiff,

v.

THE BOEING COMPANY, EMPLOYEE
BENEFITS PLANS COMMITTEE,

Defendant.

NO. 17-cv-01354 RSM

**STIPULATED MOTION FOR
EXTENSION OF TIME FOR RULE 26(F)
CONFERENCE, INITIAL DISCLOSURES,
AND JOINT STATUS REPORT**

AND ORDER

STIPULATION

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to request that the Court allow for an extension of the deadlines for the parties' FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report (collectively, the parties' "Initial Scheduling Dates"). Absent an Order extending these deadlines, the parties' Initial Scheduling Dates are as follows, pursuant to the Court's September 27, 2017 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. #3): October 25, 2017 deadline for FRCP 26(f) Conference; November 1, 2017 deadline for FRCP 26(a)(1) Initial Disclosures; and November 8, 2017 deadline for Joint Status Report and Discovery Plan as required by FRCP 26(f) and LCR 26(f). (Id. at p. 1.)

1 On September 28, 2017, the parties filed a stipulation to extend Defendants' deadline for
2 their responses to Plaintiff's Complaint to Tuesday, October 31, 2017, given the length and
3 complexity of the Complaint's factual allegations. (Dkt. # 4.) The Court granted the stipulation
4 on September 29, 2017. (Dkt. # 5.)

5 On Tuesday, October 17, 2017 the parties conferred regarding the upcoming Initial
6 Scheduling Dates. Considering the factual issues presented by this suit, the one month extension
7 for responses to Plaintiff's Complaint until October 31, 2017, and the parties' respective
8 schedules (including holiday travel) in November, the parties jointly determined that they would
9 all benefit from additional time for Plaintiff to consider Defendants' responses to Plaintiff's
10 Complaint prior to engaging in the FRCP 26(f) Conference. Further, an extension of time of the
11 Initial Scheduling Dates would permit the parties to engage in more fruitful discussions
12 regarding the Joint Status Report. Accordingly, the parties jointly ask the Court to allow for an
13 extension of the Initial Scheduling Dates as follows:

14 • November 30, 2017: Deadline for FRCP 26(f) Conference
15 • December 8, 2017: Initial Disclosures Pursuant to FRCP 26(a)
16 • December 19, 2017: Combined Joint Status Report as Required by FRCP 26(f)
17 and LCR 26(f).

18 IT IS SO STIPULATED.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

1 DATED this 23rd day of October, 2017.

2
3 FOX ROTHSCHILD LLP

4 s/ Arlene M. Brown (with permission)

5 Arlene M. Brown, *Pro Se*
6 239 SW 189th Pl.

7 Normandy Park, WA 98166

8 Phone: 206-431-8693

9 Email: pensionrights707@gmail.com

10 *Plaintiff*

s/ Robert M. Howie

Laurence A. Shapero, WSBA #31301

Robert M. Howie, WSBA #23092

Fox Rothschild LLP

1001 Fourth Avenue, Suite 4500

Seattle, WA 98154

Telephone: 206.624.3600

Facsimile: 206.389.1708

Email: lshapero@foxrothschild.com

rhowie@foxrothschild.com

Emily Glunz, *pro hac vice*

Deborah Davidson, *pro hac vice*

Morgan Lewis & Bockius LLP

77 West Wacker Drive, Fifth Floor

Chicago, IL 60601

Telephone: 312-324-1000

Facsimile: 312-324-1001

Email: Emily.glunz@morganlewis.com

Deborah.davidson@morganlewis.com

Attorneys for Defendant

ORDER

The stipulation of the parties is hereby entered. The revised Initial Discovery Deadlines are as follows:

- November 30, 2017: Deadline for FRCP 26(f) Conference
- December 8, 2017: Initial Disclosures Pursuant to FRCP 26(a)
- December 19, 2017: Combined Joint Status Report as Required by FRCP 26(f) and LCR 26(f).

DATED this 25th day of October 2017.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

FOX ROTHSCHILD LLP

By: s/ Robert M. Howie
Laurence A. Shapero, WSBA #31301
Robert M. Howie, WSBA #23092

Deborah S. Davidson (*pro hac vice*)
Emily A. Glunz (*pro hac vice*)
Attorneys for Defendants

By: s/ Arlene M. Brown
Arlene M. Brown, *Pro Se*
Plaintiff