THE HONORABLE ROBERT S. LASNIK 1. 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 PACIFIC INTER-MOUNTAIN DISTRIBUTION, LLC, a Delaware limited No. 2:17-cv-01435 RSL 10 liability company, STIPULATED MOTION AND 11 (PROPOSED) ORDER FOR Plaintiff, EXTENSION OF TIME TO EXTEND 12 DISCOVERY & MOTION DEADLINES 13 JOHN VERMILLION, individually and the marital community composed of JOHN NOTE ON MOTION CALENDAR: 14 VERMILLION and DEBRA VERMILLION. December 1, 2017 VERMILLION'S ENVIRONMENTAL 15 PRODUCTS & APPLICATIONS, INC. d/b/a **ENVIRONMENTAL PRODUCTS &** 16 APPLICATIONS, INC., a California corporation, 17 Defendants. 18 19 STIPULATION 20 COMES NOW Plaintiff Pacific Inter-Mountain Distribution, LLC ("Plaintiff") and 21 Defendants John Vermillion, Debra Vermillion, Vermillion's Environmental Products & 22 Applications, Inc. ("Defendants"), by and through their respective counsel, to stipulate and 23 request the Court's November 11, 2017 Order Regarding Initial Disclosures, Joint Status 24 Report, and Early Settlement be adjusted as follows: 25 CORR CRONIN MICHELSON STIPULATED MOTION AND (PROPOSED) ORDER FOR BAUMGARDNER FOGG & MOORE LLP EXTENSION OF TIME TO EXTEND DISCOVERY & 1001 Fourth Avenue, Suite 3900 Seattle, Washington 98154-1051 MOTION DEADLINES - Page 1 (Case No. 2:17-cv-01435 RSL) Tel (206) 625-8600

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Deadline	Prior Date	Requested Date
Deadline for FRCP 26(f) Conference	11/29/2017	12/13/2017
Initial Disclosures Pursuant to FRCP 26(a)(1)	12/06/2017	12/20/2017
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f):	12/13/2017	12/27/2017

As grounds for this motion, the parties state:

- 1. No prior request for continuance has been made in this case.
- 2. Plaintiff commenced this litigation by filing a Complaint for (1) Breach of Contract, (2) Tortious Interference with Business Expectancy; and (3) Fraud, in the United States District Court, Western District of Washington, at Tacoma, on September 21, 2017. See DKT 1.
- 3. The undersigned counsel for Defendants appeared as substitute counsel on November 20, 2017 and requires additional time to prepare the Rule 26 Conference and review the claims and defenses.
- 4. Plaintiff agrees with this request, and the parties believe with the upcoming holiday season an extension of time is reasonable under the circumstances.

Accordingly, the parties respectfully stipulate and request that the Court grant the parties an extension of time for FRCP 26 deadlines set by this Court.

Stipulated and agreed to this 1st day of December, 2017.

s/ Blake Marks-Dias
Steven W. Fogg, WSBA No. 23528
Blake Marks-Dias, WSBA No. 28169
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s/Lisa M. Marchese Lisa M. Marchese, WSBA No. 18396 Nathan W. Rouse, WSBA No. 46433 DAVIS WRIGHT TREMAINE LLP 1201 Third Avenue, Suite 2200 Seattle, Washington 98101-3045 (206) 622-3150 Phone

STIPULATED MOTION AND (PROPOSED) ORDER FOR EXTENSION OF TIME TO EXTEND DISCOVERY & MOTION DEADLINES – Page 2 (Case No. 2:17-cv-01435 RSL)

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4	Attorneys for Defendants John Vermillion, Debra Vermillion, and Vermillion's
5	Environmental Products & Applications, Inc.
6	
7	THIS MATTER having come before
8	Court GRANTS the relief requested. The
9	
10	Deadline
11	Deadline for FRCP 26(f) Conference
12	Initial Disclosures Pursuant to FRCP
13	26(a)(1)
14	Combined Joint Status Report and Discovery Plan as Required by FRCP
15	26(f) and LCR 26(f):
16	DATED this 6 day of 100
17	
18	
19	
20	
21	Presented by:
22	s/Blake Marks-Dias
23	Steven W. Fogg, WSBA No. 23528 Blake Marks-Dias, WSBA No. 28169
- 24	CORR CRONIN MICHELSON
25	BAUMGARDNER FOGG & MOORE LI 1001 Fourth Avenue, Suite 3900
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Attorneys for Plaintiff Pacific Inter-Mountain Distribution, LLC

## ORDER

before the Court on the stipulation of the parties, the The following deadlines are adjusted by two weeks:

Deadline	Prior Date	Requested Date
Deadline for FRCP 26(f) Conference	11/29/2017	12/13/2017
Initial Disclosures Pursuant to FRCP 26(a)(1)	12/06/2017	12/20/2017
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f):	12/13/2017	12/27/2017

HONORABLE ROBERT S. LASNIK Senior United States District Judge

s/Lisa M. Marchese Lisa M. Marchese, WSBA No. 18396 Nathan W. Rouse, WSBA No. 46433 DAVIS WRIGHT TREMAINE LLP

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STIPULATED MOTION AND (PROPOSED) ORDER FOR EXTENSION OF TIME TO EXTEND DISCOVERY & MOTION DEADLINES - Page 3 (Case No. 2:17-cv-01435 RSL)

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<b>,</b>	Attorneys for Defendants John Vermillion, Debra Vermillion, and Vermillion's Environmental Products & Applications,	Attorneys for Plaintiff Pacific Inter- Mountain Distribution, LLC	
,	Inc.		
		•	
		Corr Cronin Michelson	

STIPULATED MOTION AND (PROPOSED) ORDER FOR EXTENSION OF TIME TO EXTEND DISCOVERY & MOTION DEADLINES – Page 4 (Case No. 2:17-cv-01435 RSL)

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