{17096/008/01685567-1}

Honorable Thomas S. Zilly 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF **WASHINGTON AT SEATTLE** 9 10 TALCO SERVICES, LLC, NO. 17-01516-TSZ 11 Plaintiff, STIPULATED MOTION AND 12 ORDER TO EXTEND EXPERT V. DISCLOSURE DEADLINE BY ONE 13 BNSF RAILWAY COMPANY, a WEEK (JUNE 25 TO JULY 2, 2018) Delaware corporation, 14 Defendant. 15 16 **STIPULATION** 17 18 Talco Services, LLC, the Plaintiff, herein ("Talco"), and BNSF Railway Company, 19 THE Defendant ("BNSF"), by and through their undersigned counsel, stipulate, and 20 move the Court for entry of the agreed order set forth below extending the deadline 21 by one week for the disclosure of expert testimony under FRCP 26(a)(2), from 22 Monday, June 25, 2018 to Monday, July 2, 2018. In the course of discussing AND 23 finalizing the damages analysis with its damages expert, Talco and its expert 24 concluded that certain additional information from Talco's records was necessary and 25 26 STIPULATED MOTION AND ORDER TO MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC EXTEND EXPERT DISCLOSURE DEADLINE ATTORNEYS AT LAW OF ONE WEEK (JULY 2, 2018)- 1 5500 COLUMBIA CENTER (Case No. 17-01516-TSZ) 701 FIFTH AVENUE

Dockets.Justia.com

SEATTLE, WA 98104-7096

(206) 682-7090 TEL (206) 625-9534 FAX

| 1 | Talco's Principal, Gregory Nordholm, has been in the field performing a job this week |
|----|---|
| 2 | which has rendered him unable to provide the additional information to Talco's |
| 3 | expert. BNSF is agreeable to a one week extension to accommodate Talco's |
| 4 | circumstances, and BNSF confirms that agreement in the form of this stipulation by |
| 5 | way of the signature of BNSF's counsel below. An extension will not adversely |
| 6 | impact the case schedule or discovery as the discovery cutoff date is September 24, |
| 7 | 2018. |
| 9 | 2010. |
| 10 | Dated this 22 nd day of June, 2018 |
| 11 | MONTGOMERY PURDUE BLANKINSHIP |
| 12 | & AUSTIN PLLC |
| 13 | <u>s/ Michael E. Gossler</u> Michael E. Gossler, WSBA No. 11044 |
| 14 | 701 Fifth Avenue, Suite 5500 Seattle, WA 98104 |
| 15 | Telephone: (206) 682-7090 Fax: (206) 625-9534 |
| 16 | mgossler@mpba.com Attorneys for Plaintiff |
| 17 | Allomeys for Flaintin |
| 18 | MONTGOMERY SCARP & CHAIT, PLLC |
| 19 | <u>s/ Kelsey Endres</u> Kelsey Endres, WSBA No. 39409 |
| 20 | 1218 Third Avenue, Suite 2500 Seattle, WA 98101 |
| 21 | Telephone: (206) 625-1801 Fax: (206) 625-1807 |
| 22 | kelsey@montgomeryscarp.com |
| 23 | Attorneys for Defendant |
| 25 | |

STIPULATED MOTION AND ORDER TO EXTEND EXPERT DISCLOSURE DEADLINE OF ONE WEEK (JULY 2, 2018)- 2 (Case No. 17-01516-TSZ)

MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC

ATTORNEYS AT LAW
5500 COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WA 98104-7096
(206) 682-7090 TEL
(206) 625-9534 FAX

26

ORDER

The Court being advised of said stipulation, hereby approves an extension of the date for disclosure of expert testimony under FRCP 26(a)(2) from June 25, 2018 to July 2, 2018.

IT IS SO ORDERED.

Dated this 27th day of June, 2018.

Thomas S. Zilly United States District Judge

lly 2 amon 1

STIPULATED MOTION AND ORDER TO EXTEND EXPERT DISCLOSURE DEADLINE OF ONE WEEK (JULY 2, 2018)- 3 (Case No. 17-01516-TSZ)

{17096/008/01685567-1}

MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC

ATTORNEYS AT LAW
5500 COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WA 98104-7096
(206) 682-7090 TEL
(206) 625-9534 FAX