

THE HONORABLE JAMES L. ROBERT

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE

BRETT CALDWELL, an individual,  
  
Plaintiff,  
  
v.  
  
THE BOEING COMPANY, a Delaware  
Corporation and DOES 1-10;  
  
Defendant.

Case No. 2:17-cv-01741-JLR

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT AND ~~PROPOSED~~ ORDER**

**NOTE FOR MOTION: DECEMBER, 7,  
2017**

*JWR*

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to extend the deadline for Defendant The Boeing Company (“Boeing”) to file its Response to Plaintiff’s Complaint, which was filed on November 17, 2017 and served on November 21, 2017 (Dkt. Nos. 1 & 7). In the absence of an Order extending the deadline to respond to Plaintiff’s Complaint, Defendant Boeing’s response must be filed by no later than December 12, 2017.

The Parties now agree to extend Defendant’s time to answer, move, or otherwise respond to the Complaint to provide time for counsel to investigate the facts and the law in order to prepare an appropriate response to the Complaint, and Plaintiff’s counsel consented to the requested extension. The Parties therefore join in asking the Court to extend the deadline for Defendant to answer, move, or otherwise respond to the Complaint until December 29, 2017.

STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO  
COMPLAINT AND ~~PROP.~~ ORDER - (2:17-CV-01741-JLR) - 1

**Fox Rothschild LLP**  
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DATED this 7<sup>th</sup> day of December , 2017.

HELSELL FETTERMAN LLP

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*Attorneys for Plaintiff*

STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO  
COMPLAINT AND PROP. ORDER - (2:17-CV-01741-JLR) - 2

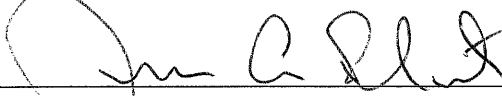
**Fox ROTHSCHILD LLP**  
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PROPOSED ORDER

*JLR*

Pursuant to the stipulated motion of the parties as set forth above, IT IS HEREBY ORDERED that the motion is GRANTED, and IT IS HEREBY ORDERED that the deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint is extended to December 29, 2017.

IT IS SO ORDERED this 7<sup>th</sup> day of Dec., 2017.

  
\_\_\_\_\_  
THE HONORABLE JAMES L. ROBERT  
United States District Judge  
*A*

Presented By:

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STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT AND ~~PROP.~~ ORDER - (2:17-CV-01741-JLR) - 3

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**CERTIFICATE OF SERVICE**

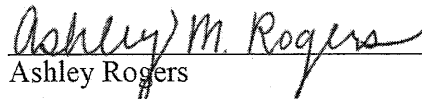
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2 I hereby certify that on the date below written, I electronically filed the foregoing with  
3 the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy  
4 of same by the method indicated below and addressed as follows:

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19 *Attorney for Plaintiff*

20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct. Executed on December 7, 2017, in accordance with 28 USC 1746.  
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Ashley Rogers