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THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BRETT CALDWELL, an individual,

Plaintiff,

v.
THE BOEING COMPANY, a Delaware
Corporation and DOES 1-10;

Defendants.

Case No. 2:17-cv-01741-JLR **AND ORDER**
**STIPULATED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT AND TO
ESTABLISH A BRIEFING SCHEDULE
FOR DEFENDANT'S ANTICIPATED
MOTION TO DISMISS**
NOTING DATE: DECEMBER 21, 2017

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 and to establish a stipulated briefing schedule for the motion to dismiss that Boeing anticipates filing. In support of this stipulated motion, the Parties state as follows:

1. Mr. Caldwell filed his Complaint on November 17, 2017 and served Boeing on November 21, 2017. (See Dkt. Nos. 1 & 7).
2. On December 7, 2017, the Parties filed a Stipulated Motion for Extension of Time to Respond to Complaint, requesting that Boeing's response to Mr. Caldwell's Complaint be due on or before December 29, 2017. (Dkt. No. 8). The Court granted the Parties' motion on December 8, 2017 and extended Boeing's deadline to answer, move, or otherwise respond to Mr. Caldwell's Complaint to December 29, 2017. (Dkt. No. 10).

STIPULATED MOTION FOR EXTENSION OF TIME
AND TO ESTABLISH BRIEFING SCHEDULE - 1

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1 3. After the Court's Order, Mr. Caldwell's counsel contacted Boeing's counsel and inquired
2 whether Boeing would agree to an extension of time for Mr. Caldwell to respond to any motion to
3 dismiss that Boeing may file in light of the upcoming holidays and Mr. Caldwell's counsel's health
4 issues. Boeing's counsel indicated that Boeing anticipates filing a motion to dismiss and that Boeing
5 would agree to such an extension. Thereafter, the Parties' counsel agreed upon the following briefing
6 schedule for Boeing's anticipated motion to dismiss:

- 7 a. Friday, January 12, 2018 – Deadline for Boeing to answer, move, or otherwise
8 respond to Mr. Caldwell's Complaint;
- 9 b. Monday, February 12, 2018 – Deadline for Mr. Caldwell to oppose any motion to
10 dismiss that Boeing may file;
- 11 c. Friday, February 23, 2018 – Deadline for Boeing to file any reply in support of its
12 motion to dismiss;
- 13 d. Friday, February 23, 2018 – Noting Date for any motion to dismiss that Boeing
14 may file.

15 WHEREFORE, the Parties therefore join in asking the Court to extend the deadline for
16 Defendant to answer, move, or otherwise respond to the Complaint until January 12, 2018 and to issue
17 an Order establishing the stipulated briefing schedule described above.

1 DATED this 21st day of December 2017:

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STIPULATED MOTION FOR EXTENSION OF TIME
AND TO ESTABLISH BRIEFING SCHEDULE - 3

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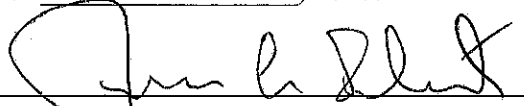
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PROPOSED ORDER

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 January 12, 2018. IT IS FURTHER ORDERED that the deadlines related to any motion to dismiss that Defendant Boeing may file are established as follows:

1. Friday, January 12, 2018 – Deadline for Boeing to answer, move, or otherwise respond to Mr. Caldwell's Complaint;
2. Monday, February 12, 2018 – Deadline for Mr. Caldwell to oppose any motion to dismiss that Boeing may file;
3. Friday, February 23, 2018 – Deadline for Boeing to file any reply in support of its motion to dismiss;
4. Friday, February 23, 2018 – Noting Date for any motion to dismiss that Boeing may file.

IT IS SO ORDERED this 22ND day of December, 2017.



THE HONORABLE JAMES L. ROBERT
United States District Judge

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Presented by:

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2017, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which caused a true and correct copy of the foregoing to be served upon:

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