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

# LORENZO SANTIAGO SALAS,

Plaintiff,

vs.

PPG ARCHITECTURAL FINISHES, INC., a Delaware Corporation; HOMAX PRODUCTS, INC., a Washington Corporation; SHIELD PACKAGING OF CALIFORNIA, INC., a California Corporation; and, JOHN DOES 1-3,

Defendants.

NO. C17-1787 RSM

STIPULATION AND ORDER EXTENDING THE DISCOVERY DEADLINE FOR THE DEPOSITION OF DEFENDANT SHIELD PACKAGING OF CALIFORNIA, INC.

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## **STIPULATION**

COME NOW the parties hereto, by and through their respective counsel of record, and hereby stipulate to entry of an order authorizing the parties to conduct the deposition of defendant Shield Packaging of California, Inc. ("Shield")'s F.R.C.P. (30)(b)(6) witness shortly after the discovery deadline set forth in the Court's Order Setting Trial Date and Related Dates (Doc. #11). The requested variance from the existing scheduling order is sought for this deposition only, and the parties have agreed that the deposition may take place on October 30, 2018, should the Court so allow. The parties request leave of Court to accommodate the availability of Shield's designee, who resides and works in Southern California, and the respective litigation and travel schedules of coursel.

RESPECTFULLY SUBMITTED THIS 28<sup>th</sup> day of September, 2018.

#### Martens + Associates | P.S.

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By: <u>/s/ Richard L. Martens</u> Richard L. Martens, WSBA #4737 Jane J. Matthews, WSBA #41729 Angeli-Ann Punzalan Kim, WSBA #49836 Attorneys for Defendants PPG Architectural Finishes, Inc. and Shield Packaging of California, Inc. Email: <u>rmartens@martenslegal.com</u> <u>imatthews@martenslegal.com</u> <u>apunzalan@martenslegal.com</u> Telephone: (206) 709-2999 Fax: (206) 709-2722 By: /s/ Damian S. Mendez Damian S. Mendez, WSBA #36157 Of Attorneys for Plaintiff Email: damian@damianmendezlaw.com Telephone: (206) 290-5148 Fax: (206) 260-9010

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## <u>ORDER</u>

THIS MATTER having come before the Court on the parties' stipulation, and the Court having considered the Stipulation herein, IT IS HEREBY ORDERED that the discovery deadline set forth in the Court's Order Setting Trial Date and Related Dates (Dkt. #11) is extended to October 30, 2018, for the sole purpose of taking the Fed. R. Civ. P. 30(b)(6) deposition of defendant Shield Packaging of California, Inc.

DATED this 12<sup>th</sup> day of October 2018.

RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

Martens + Associates | P.S.

# Mendez Law Group, PLLC

By: <u>/s/ Richard L. Martens</u> Richard L. Martens, WSBA #4737 Jane J. Matthews, WSBA #41729 Angeli-Ann Punzalan Kim, WSBA # 49836 Attorneys for Defendants PPG Architectural Finishes, Inc. and Shield Packaging of California, Inc. Email: <u>rmartens@martenslegal.com</u> <u>jmatthews@martenslegal.com</u> <u>apunzalan@martenslegal.com</u> Telephone: (206) 709-2999 By: /s/ Damian S. Mendez Damian S. Mendez, WSBA #36157 Of Attorneys for Plaintiff Email: <u>damian@damianmendezlaw.com</u> Telephone: (206) 290-5148

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