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Judge Thomas S. Zilly  
Trial Date: 04-19-21

IN THE U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BAO XUYEN LE, as Personal  
Representative of the Estate of Tommy Le;  
HOAI "SUNNY" LE; and DIEU HO,

Plaintiffs,

v.

REVEREND DR. MARTIN LUTHER  
KING, JR. COUNTY; and KING  
COUNTY DEPUTY SHERIFF CESAR  
MOLINA,

Defendants.

NO. 2:18-cv-00055-TSZ

**STIPULATED MOTION & ORDER  
TO MODIFY SCHEDULING ORDER  
TO ALLOW FOR THE TAKING OF  
THE DEPOSITION OF RICARDO  
FUENTES AFTER THE DISCOVERY  
COMPLETION DATE**

**STIPULATION**

The parties to this action through their attorneys of record ask the Court to confirm and order the following stipulation:

1. Pursuant to the September 21, 2020 scheduling order, the discovery completion deadline for this matter was February 1, 2021.

2. Defendant King County supplemented its discovery responses, on February 18, 2021, with newly discovered evidence, namely the "*Office of Law Enforcement Oversight, King County Sheriff's Department, Officer-Involved Shooting Incident, January 14, 2017*", (KCSO Summary).

3. The KCSO Summary was authored by Ricardo Fuentes, a former representative of the Office of Law Enforcement Oversight (OLEO).

**STIP. MOT. & ORDER TO  
MODIFY SCH. ORDER - 1  
NO. 2:cv-18-00055-TSZ**

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1 4. Recognizing that the KCSO Summary is newly discovered evidence produced by  
2 Defendant King County after the discovery completion date and reserving to the Plaintiffs the future  
3 right to seek relief from the Court based on this newly discovered evidence and Defendant King  
4 County’s post-discovery cut off supplement to discovery, the parties have agreed to modify the existing  
5 scheduling order to allow for the taking of the Deposition of Ricardo Fuentes.  
6

7 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

8  
9 For the Plaintiffs

10 s/ Philip G. Arnold  
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12 Jeffery M. Campiche, WSBA No. 7592  
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For Defendant King County

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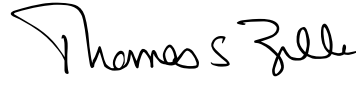
For Defendant Deputy Cesar Molina

s/ for Timothy R. Gosselin w/ permission  
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**ORDER**

Pursuant to stipulation between Plaintiffs and Defendants King County and Deputy Molina, it is so ordered.

DATED this 23rd day of February, 2021.



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Thomas S. Zilly  
United States District Judge

Presented by:

s/ Philip G. Arnold

Philip G. Arnold, WSBA No. 2675

Attorneys for the Plaintiffs

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