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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ALAN KWANG,

Plaintiff,

v.

ROYAL CANIN USA, INC., et al.

Defendants.

Case No. 2:18-cv-00178-MJP

Hon. Marsha J. Pechman

**STIPULATION AND ~~[PROPOSED]~~
ORDER REQUESTING
CONTINUANCE OF DISCOVERY
CUTOFF**

Noting Date: December 14, 2018

1 Plaintiff, ALAN KWANG, and Defendant, ROYAL CANIN USA, INC.,
2 hereby stipulate as follows:

3 WHEREAS, the trial date currently set for this matter is May 13, 2019, and
4 the current discovery cutoff date is December 14, 2018.

5 WHEREAS, the Parties have been diligent in their pursuit of discovery,
6 having exchanged and responded to written discovery requests and taking the
7 depositions of key witnesses.

8 WHEREAS, the scheduling of witness depositions was difficult due to the
9 place of residence of the witnesses along with calendaring conflicts of the witnesses
10 and the attorneys in this matter.

11 WHEREAS, during witness depositions, the existence of documents and
12 information, potentially relevant to this litigation, was brought to light and the
13 witnesses provided contradictory testimony regarding these documents and
14 information.

15 WHEREAS, considering this information, the Parties agree to a continuance
16 of the discovery cutoff to January 14, 2019, to allow for a written request to be made
17 of these documents and information.

18 WHEREAS, this is the first request for a continuance of any date in this
19 action and the Parties request a short continuance to allow them to complete their
20 discovery. This request will not impact the current trial date.

21 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and
22 between the respective attorneys of record for Plaintiff and Defendant, subject to
23 the Court's approval as follows:

- 24 1. That the current discovery cutoff date of December 14, 2018,
25 shall be continued to January 14, 2019;

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2. That all other dates set by the June 19, 2018 Order Setting Trial shall remain unchanged.

IT IS SO STIPULATED.

Dated: December 14, 2018

Defiance Law PLLC

/s/Kevin P. Smith
Kevin P. Smith, WSBA No. 48578
Attorney for Plaintiff

Harbor Law PLLC

/s/Angie Lee
Angie Lee, WSBA No. 47104
Attorney for Plaintiff

Town Center Law

/s/Attila Denes
Attila Denes, WSBA No. 40436
Attorney for Plaintiff

Dated: December 14, 2018

Barran Liebman LLP

/s/Andrew M. Schpak
Andrew M. Schpak, WSBA No. 39901
Attorney for Defendant

Harmon & Davies, P.C.

/s/Laura B. Gallagher
Laura B. Gallagher, Admitted *Pro Hac*
Vice
Attorney for Defendant

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ORDER

The Court has considered the above stipulation of the parties. The stipulation is hereby adopted by the Court.

Dated: December 18, 2018



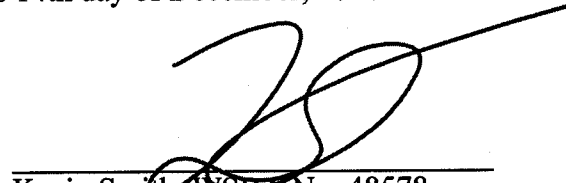
Hon. Marsha J. Pechman

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record in the above case.

DATED at Tacoma, Washington this 14th day of December, 2018.



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Tacoma, WA 98402
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Attorney for Plaintiff Alan Kwang