

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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

RICHARD HOMCHICK,

Plaintiff,

v.

KING COUNTY, a home rule charter county and  
municipal corporation doing business as the  
KING COUNTY SHERIFF’S OFFICE and the  
KING COUNTY PROSECUTING  
ATTORNEY’S OFFICE; JOHN URQUHART,  
individually and in his official capacity as King  
County Sheriff; DANIEL SATTERBERG,  
individually and in his official capacity as King  
County Prosecutor,

Defendants.

No. C18-00377-JLR

STIPULATION AND ORDER FOR  
A LIMITED EXTENSION TO  
DISCOVERY DEADLINE TO  
ACCOMMODATE SELECT  
DEPOSITIONS

***Noted for Consideration:***  
**July 30, 2020**

**STIPULATION**

The parties hereby jointly seek permission from the Court to conduct select depositions after the upcoming August 3, 2020, discovery deadline, given certain complications related to scheduling as set forth below.

Under the current schedule, the deadline to complete discovery in this matter is August 3, 2020. Dkt. #53. However, there are a small number of depositions remaining that, despite best efforts, the parties are unable to complete by the deadline due primarily to witness unavailability.

1 Specifically, Defendants seek to depose Plaintiff’s expert, Lauren Freeman, who  
2 produced her final report on July 3, 2020, in compliance with the expert disclosure deadline.  
3 See Dkt. #57. Because Ms. Freeman was not available during the latter part of July when  
4 Defendants sought to take her deposition, the parties have agreed, pending the Court’s approval,  
5 to hold Ms. Freeman’s deposition on August 6, 2020, *i.e.*, three days after the current cut-off.

6 Likewise, Plaintiff has sought for the last two months to schedule a deposition of non-  
7 party Demand Abolition through its counsel. After initial indications that the Demand Abolition  
8 witness would be available in July and that dates would be provided for that deposition in that  
9 timeframe, Plaintiff was informed on July 13, 2020, that the witness had departed for a vacation  
10 and would not return until the week of August 3, 2020. That deposition is now tentatively  
11 scheduled for August 11, 2020.

12 Finally, Plaintiff informed Defendants last month about the potential need to conduct  
13 one or two depositions after Plaintiff received a supplemental production of documents then-  
14 anticipated from the Sheriff’s Office. Last Friday, Plaintiff received approximately 26,000  
15 pages of emails. Plaintiff is diligently reviewing those documents to ascertain the need and  
16 timing for depositions(s), but, given the volume of materials and competing obligations, as well  
17 as witness availability issues, any such deposition(s) unfortunately cannot be realistically  
18 completed by August 3, 2020. A limited two-week extension will allow for the parties to  
19 coordinate scheduling that deposition(s) and to resolve any other attendant issues.

20 For the above-stated reasons, the parties respectfully request that the Court enter the  
21 below Order, extending the discovery deadline by no more than two weeks to August 17, 2020.  
22 Such an extension should not impact any other deadlines on the current case schedule.

23 //

24 //

25 //

26 //

1 STIPULATED AND AGREED TO this 30th day of July, 2020.

2 Respectfully Submitted,

3 BAILEY DUQUETTE P.C.

KING COUNTY PROSECUTING  
ATTORNEY'S OFFICE

4 By: /s/ Hozaiifa Y. Cassubhai  
5 Hozaiifa Y. Cassubhai, WSBA #39512  
6 500 Union Street, Suite 800  
7 Seattle, Washington 98101  
8 Telephone: 206.225.2250  
9 Email: [hozaifa@baileyduquette.com](mailto:hozaifa@baileyduquette.com)

By: /s/ David Hackett  
David Hackett, WSBA #21236  
Amy Montgomery, WSBA #32068  
900 King County Administration Bldg.  
500 Fourth Avenue  
Seattle, Washington 98104  
Telephone: 206.296.0430  
Email: [david.hackett@kingcounty.gov](mailto:david.hackett@kingcounty.gov)  
[amy.montgomery@kingcounty.gov](mailto:amy.montgomery@kingcounty.gov)

*Attorneys for Plaintiff Richard Homchick*

*Attorneys for Defendants King County  
Prosecuting Attorney's Office, King County  
Sheriff's Office, Daniel Satterberg, and  
John Urquhart*

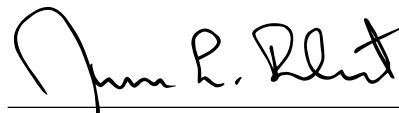
15 **ORDER**

16 The Court's scheduling order (Dkt. #53) is amended as follows:

	Current Date	New Date
Discovery Deadline	August 3, 2020	August 17, 2020

19 **IT IS SO ORDERED.**

20 DATED this 13th day of August, 2020.

21  
22 

23  
24 THE HONORABLE JAMES L. ROBERT  
25 UNITED STATES DISTRICT COURT  
26

1 **CERTIFICATE OF FILING AND SERVICE**

2 I hereby certify that, on July 30, 2020, I electronically filed the foregoing document  
3 with the Clerk of the Court using the CM/ECF System, which will send notification of such  
4 filing to those attorneys of record registered on the CM/ECF system.

5 Dated this July 30, 2020.

6 BAILEY DUQUETTE P.C.

7  
8 By /s/ Hozaiifa Y. Cassubhai

9 Hozaifa Y. Cassubhai, WSBA#39512

10 500 Union Street, Suite 800

11 Seattle, Washington 98101

12 Telephone: (206) 225-2250

13 Fax: (866) 233-5869

14 Email: [hozaifa@baileyduquette.com](mailto:hozaifa@baileyduquette.com)

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
*Attorney for Plaintiff Richard Homchick*