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

JEFFREY BOICE,

Plaintiff,

vs.

ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY,

Defendant.

NO. C18-378 RSM

STIPULATED MOTION AND ORDER
TO EXTEND THE DISCOVERY
CUTOFF AND EXPERT WITNESS
DISCLOSURE DEADLINES

The current discovery cutoff deadline in this matter is scheduled for Monday, December 10, 2018. This matter is scheduled for trial on April 8, 2019. The parties have been working together diligently to complete discovery. However, Allstate only received plaintiff’s responses to written discovery on October 18, 2018, nearly 4 months after the requests were served on plaintiff. Allstate received a signed medical records stipulation on October 12, and has been gathering medical records since that time.

The parties have been exercising due diligence in their efforts to schedule plaintiff’s deposition and Independent Medical Examination (“IME”). Scheduling plaintiff’s deposition and IME have been difficult because plaintiff no longer resides in the State of Washington. Plaintiff now lives in Arizona and works full time as a border patrol agent, limiting his availability in Washington for deposition and IME. Plaintiff is willing to participate in the

STIPULATED MOTION AND ORDER TO EXTEND
THE DISCOVERY CUTOFF AND EXPERT WITNESS
DISCLOSURE DEADLINES– 1
[Case No. 2:18-cv-00378-RSM]

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1 completion of discovery, but it has become apparent that it will be necessary to complete
2 plaintiff's deposition and IME on a date after the currently scheduled cutoff deadline of Monday,
3 December 10, 2018. The parties have agreed that the deposition and IME will take place on
4 December 19. The examiner will need at least two weeks to prepare a report. The parties request
5 that the discovery cutoff and expert disclosure deadlines be extended.

6 IT IS HEREBY STIPULATED and agreed by and between the parties, through their
7 respective counsel, that the discovery cutoff deadline and the expert witness disclosure deadline
8 be extended to January 14, 2019.

9
10 DATED this 30th day of November, 2018.

11
12 REED McCLURE

13
14 *s/Michael S. Rogers*

15 Michael S. Rogers, WSBA #16423
16 Joshua T. Hartmann, WSBA #45008
17 Counsel for Defendant Allstate

18 LAW OFFICES OF RILEY D. LEE

19 *s/Riley D. Lee*

20 Riley D. Lee, WSBA #20825
21 Counsel for Plaintiff

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ORDER

Based on the foregoing stipulation of counsel for parties, the Court hereby finds good cause to allow an extension of the discovery cutoff deadline and the expert witness disclosure deadline and both are extended to January 14, 2019. All other deadlines remain as scheduled.

DATED this 6th day of December 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

REED McCLURE

s/Michael S. Rogers

Michael S. Rogers, WSBA #16423
Joshua T. Hartmann, WSBA #45008
Counsel for Defendant Allstate

LAW OFFICES OF RILEY D. LEE

s/Riley D. Lee

Riley D. Lee, WSBA #20825
Counsel for Plaintiff

STIPULATED MOTION AND ORDER TO EXTEND
THE DISCOVERY CUTOFF AND EXPERT WITNESS
DISCLOSURE DEADLINES– 3
[Case No. 2:18-cv-00378-RSM]

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