

HONORABLE JUDGE MARSHA J. PECHMAN
MAGISTRATE JUDGE BRIAN A. TSUCHIDA

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

JOE J.W. ROBERTS, JR.,

Plaintiff,

v.

VILMA KHOUNPHIXAY, et al.,

Defendants.

NO. 2:18-cv-0746-MJP-BAT

MOTION AND JOINT
STIPULATION TO MODIFY
DEADLINES AND PROPOSED
ORDER

MOTION

The parties submit the following Motion and Joint Stipulation for an Order modifying the Deadlines in this Court's Pre-Trial Scheduling Order, Dkt. 91, to extend all deadlines by approximately six weeks in accordance with Fed. R. Civ. P. 16(b)(4).

I. JOINT STIPULATION

The parties jointly stipulate to extend all the deadlines in this Court's Pre-Trial Scheduling Order, Dkt. 91, by approximately six weeks. This stipulation would set the deadline for non-expert discovery to be completed from November 15, 2019 to **December 27, 2019**. This stipulation would set the deadline for the disclosure of experts from December 15, 2019 to **January 27, 2020**. This stipulation would set the deadline for expert discovery to be completed from January 31, 2020 to **March 13, 2020**. This stipulation would set the deadline to file and

1 serve any dispositive motion from February 18, 2020 to **March 27, 2020**. The parties stipulate
2 to extend these deadlines to allow time for the parties finish some remaining fact witness
3 depositions. In addition, there is a pending Motion to Dismiss currently before the Court
4 regarding the claims against the Department of Corrections. Dkt. 95. The parties also stipulate
5 to extend these deadlines in order to avoid unnecessary litigation over discovery matters while
6 that motion is pending. This extension will not affect any other deadlines including the trial date,
7 which is currently set for **July 20, 2020**.

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9 Law Office of Harry Williams
10 Law Office of Jennifer Horwitz, PLLC

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16 Attorneys for Plaintiff

17 DATED this 8th day of November 2019.

18
19 ROBERT W. FERGUSON
20 Attorney General

21 By: s/ Aaron Williams
22 Aaron Williams, WSBA #46044
23 AaronW@atg.wa.gov
24 Attorney for Defendants

25 DATED this 8th day of November 2019.
26

ORDER

Based on the stipulation of the parties, the Court **ORDERS:**

1. The stipulation of the parties is **GRANTED**;
2. The non-expert discovery cutoff deadline is moved to **December 27, 2019**;
3. The deadline for disclosure of experts is moved to **January 27, 2020**;
4. The expert discovery cutoff deadline is moved to **March 13, 2020**;
4. The deadline to file and serve any dispositive motion is moved to **March 27, 2020**;
5. The Clerk shall send copies of this Order to counsel for all parties.

IT IS SO ORDERED this 14th day of November 2019.



Marsha J. Pechman
United States District Judge

Presented By:

Law Office of Harry Williams
Law Office of Jennifer Horwitz, PLLC

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DATED this 8th day of November 2019.

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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically filed the foregoing DOCUMENT with the Clerk of the Court using the CM/ECF system, which will notify the following CM/ECF participants:

Jennifer Horwitz jennifer@jenniferhorwitzlaw.com

Harry Williams IV harry@harrywilliamsllaw.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 8th day of November 2019, at Olympia, Washington.

s/ Kathy Anderson
KATHY ANDERSON, Legal Assistant
Corrections Division