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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CNA INSURANCE COMPANY LIMITED,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OF
WASHINGTON, INC. d/b/a EXPEDITORS
INTERNATIONAL OCEAN, and DOE I,

Defendants.

No. 2:18-cv-00932-RSM

PARTIES' JOINT MOTION TO
CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS

Note for Motion: October 13, 2020

COME NOW the parties, and hereby stipulate and jointly move the Court, pursuant to LCR 16(b)(6), to extend the deadlines for the parties' submission of a proposed pre-trial order, trial briefs, and any other pre-trial filings not yet exchanged or submitted until 30 days before the Court reschedules the trial date.

This admiralty matter addresses plaintiff subrogated insurer's claims against defendant non-vessel operating common carrier for cargo allegedly damaged during ocean transit. Trial was scheduled to commence on November 2, 2020. Dkt. 57. By its General Order 15-20 dated October 2, 2020, the Court continued all civil trials scheduled to commence before January 1, 2021 pending the Court's issuance of another general order. The parties are unable to agree to a trial by remote video conferencing.

The Court may extend the case scheduling dates for good cause. LCR 16(b)(6). The parties submit that good cause exists to extend the deadlines for pre-trial submissions so as to avoid their expenditure of financial and other resources during the pandemic, when such resources are challenged, and when communication with party and non-party witnesses is

PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 1
Case No. No. 2:18-cv-00932-RSM

FOSTER GARVEY PC
1111 Third Avenue, Suite 3000
Seattle, Washington 98101-3292
Phone (206) 447-4400
Fax (206) 447-9700

1 difficult. Because trial will not commence for at least several months, the parties and the Court
2 will not experience any detriment to a continuance of pre-trial filings that is commensurate with
3 the new trial date. Accordingly, the parties respectfully request a continuance of the deadlines
4 for remaining pre-trial filings.

5 DATED this 13th day of October, 2020.

6
7 s/ Steven W. Block
8 Steven W. Block, WSBA No. 24299
9 FOSTER GARVEY PC
10 1111 Third Avenue, Suite 3000
11 Seattle, Washington 98101-3292
Telephone: (206) 447-4400
Facsimile: (206) 447-9700
Email: steve.block@foster.com

12 *Attorney for Defendant Expeditors*
13 *International of Washington, Inc.*

7 s/ James F. Whitehead
8 James F. Whitehead, WSBA #6319
9 LAW OFFICE OF JAMES F. WHITEHEAD
10 2211 Elliott Ave., Suite 200
11 Seattle, Washington 98121
Telephone: (206) 448-0100
Facsimile: (206) 455-2701
Email: jim@jfw-law.com

12 s/ James A. Saville, Jr.
13 James A. Saville, Jr., *pro hac vice*
14 HILL RIVKENS LLP
15 45 Broadway, Suite 1500
16 New York, New York 10006
Telephone: (212) 669-0600
Facsimile: (212) 669-0698
Email: jsaville@hillrivkins.com

17 *Attorneys for Plaintiff CNA Insurance Company,*
18 *Ltd.*

19 **ORDER**

20 The parties having so stipulated, and the Court finding good cause for entry hereof,
21 NOW, THEREFORE, IT IS HEREBY ORDERED that the deadlines for the parties'
22 submission of a proposed pre-trial order, trial briefs, and any other pre-trial filings not yet
23 exchanged or submitted are hereby

24 CONTINUED until 30 days before the Court reschedules the trial date.
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1 Dated this 14th day of October, 2020.

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5 RICARDO S. MARTINEZ
6 CHIEF UNITED STATES DISTRICT JUDGE

7 *Presented by:*

8 */s/ Steven W. Block*

9 Steven W. Block, WSBA No. 24299
10 FOSTER GARVEY PC
11 1111 Third Avenue, Suite 3000
12 Seattle, Washington 98101-3292
13 Telephone: (206) 447-4400
14 Facsimile: (206) 447-9700
15 Email: steve.block@foster.com
16 *Attorney for Defendant Expeditors International of Washington, Inc.*

17 *s/ James F. Whitehead*

18 James F. Whitehead, WSBA #6319
19 LAW OFFICE OF JAMES F. WHITEHEAD
20 2211 Elliott Ave., Suite 200
21 Seattle, Washington 98121
22 Telephone: (206) 448-0100
23 Facsimile: (206) 455-2701
24 Email: jim@jfw-law.com

25 *s/ James A. Saville, Jr.*

26 James A. Saville, Jr., *pro hac vice*
HILL RIVKENS LLP
45 Broadway, Suite 1500
New York, New York 10006
Telephone: (212) 669-0600
Facsimile: (212) 669-0698
Email: jsaville@hillrivkins.com
Attorneys for Plaintiff CNA Insurance Company, Ltd.

PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 3
Case No. No. 2:18-cv-00932-RSM

FOSTER GARVEY PC
1111 Third Avenue, Suite 3000
Seattle, Washington 98101-3292
Phone (206) 447-4400
Fax (206) 447-9700

CERTIFICATE OF SERVICE

I certify that on October 13, 2020, I electronically filed the foregoing document with the Clerk of the Court via CM/ECF which will notify all parties in this matter who are registered with the Court's CM/ECF filing system of such filing.

Executed in Seattle, Washington this 13th day of October, 2020.

s/ Michelle Stark
Michelle Stark, Legal Assistant/Paralegal

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