

THE HONORABLE S. KATE VAUGHAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

INLAND NORTHWEST RENAL CARE)
GROUP, LLC d/b/a NORTHPOINTE)
DIALYSIS,)

No. C19-1758-JCC-SKV

Plaintiff,)

**STIPULATED MOTION
REQUESTING EXTENSION OF CASE
SCHEDULE AND PROPOSED ORDER**

v.)

WEBTPA EMPLOYER SERVICES, LLC)
and FIRST CHOICE HEALTH NETWORK,)
INC.)

**NOTE ON MOTION CALENDAR:
NOVEMBER 16, 2022**

Defendants.)

The parties to the above-captioned action, Plaintiff Inland Northwest Renal Care Group, LLC d/b/a Northpointe Dialysis (“Northwest”), Defendant WebTPA Employer Services, LLC (“WebTPA”), and Defendant First Choice Health Network, Inc. (“First Choice”), hereby stipulate and jointly request, for good cause established herein, that the Court establish the briefing schedule set forth below for the summary judgment motions that the parties expect to file shortly and to briefly extend the deadline for expert disclosures and expert discovery.

This request will not affect the trial date.

As discussed in further depth below, the parties believe that this briefing schedule will allow the parties to complete additional discovery that they are currently scheduling and to accommodate the witnesses’ and parties’ holiday schedules. It will also give the parties sufficient time to respond to the opposing summary judgment motions.

1 1. Under the current briefing scheduling, summary judgment motions must be filed
2 on November 23, 2022, with the noting date to be set no later than December 23, 2022. Initial
3 expert disclosures are due on November 18, 2022 and rebuttal expert disclosures are due by
4 December 9, 2022. The current discovery cutoff is January 13, 2023.

5 2. The parties have been diligently working on various discovery matters. Due to
6 the schedules of counsel, the witnesses, and the holidays, they are currently planning to hold
7 various depositions in early December. Setting the briefing schedule requested below will
8 allow the parties sufficient time to complete these depositions and prepare their summary
9 judgment papers.

10 3. Likewise, the parties believe that it would be most efficient for expert reports
11 and subsequent expert depositions to occur after fact discovery is complete.

12 5. To address these issues, the parties have agreed to stipulate to the following
13 schedule: (1) summary judgment motions will be due on or before December 14, 2022.
14 Opposition papers will be due on January 13, 2023. Reply papers will be due on or before
15 January 23, 2023.

16 6. The parties likewise propose that initial expert disclosures be due on January 13,
17 2023, that any responsive expert reports be due on January 27, 2023, and any expert depositions
18 be completed by February 10, 2023.

19 7. This schedule will not interfere with the trial date.

20 8. A Proposed Order is submitted herewith.

21 WHEREFORE, and for good cause shown, the parties respectfully request that the Court
22 approve the parties' stipulated schedule for summary judgment briefing, expert disclosures, and
23 discovery.

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1 Respectfully submitted on this 16th day of November, 2022.

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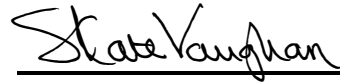
ORDER

The Parties' Stipulated Motion Requesting Extension of Case Schedule and Proposed Order is hereby GRANTED, and IT IS HEREBY ORDERED that:

The parties' respective summary judgment motions will be due on or before December 14, 2022. Opposition papers will be due on or before January 13, 2023. Reply papers will be due on or before January 23, 2023.

The parties' initial expert disclosures will be due on January 13, 2023, any responsive expert reports will be due on January 27, 2023, and any expert depositions will be completed by February 10, 2023.

SO ORDERED this 17th day of November, 2022.



S. KATE VAUGHAN
United States Magistrate Judge