

Hon. Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AFFILIATED FM INSURANCE
COMPANY, a Rhode Island corporation,
and AXCELIS TECHNOLOGIES INC.,
a Massachusetts corporation,

Plaintiffs,

v.

EXPEDITORS INTERNATIONAL NZ
LTD, a New Zealand corporation;
EXPEDITORS INTERNATIONAL OF
WASHINGTON INC., a Washington
corporation, and HAWAIIAN
AIRLINES INC., a Delaware
corporation.

Defendants.

EXPEDITORS INTERNATIONAL NZ
LTD and EXPEDITORS
INTERNATIONAL OF WASHINGTON
INC.,

Cross-Claim Plaintiffs,

v.

HAWAIIAN AIRLINES INC.,

Cross-Claim Defendant.

Cause No. 2:19-cv-01966-RAJ-BAT

STIPULATED MOTION TO EXTEND
CERTAIN PRE-TRIAL DEADLINES
AND PROPOSED ORDER

Note for Motion: May 20, 2021

JOINT MOTION TO EXTEND DEADLINES- 1
(CASE NO. 2:19-cv-01966-BAT)

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1 COME NOW all the parties to this case, and request that this Court extend certain
2 existing upcoming internal deadlines for a period of 11 days, as follows:

3 PRETRIAL DATES

4

Event:	Current Deadline:	Proposed Deadline:
All motion related to discovery must be filed by	05-28-2021	06-08-2021
Discovery completed by	06-01-2021	06-12-2021
Dispositive motions deadline	06-25-2021	07-06-2021
Mediation deadline	07-12-2021	07-12-2021
TRIAL DATE	No trial date set	No trial date set

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12 The reasons for the request for an 11-day extension are that (1) the parties are actively
13 attempting to settle the case, and would rather proceed with that than proceed with discovery and
14 (2) there may be additional witnesses identified during pending depositions, which may require
15 additional discovery. Also, the Covid-19 worldwide pandemic continues to serve as a hindrance
16 to discovery.

17 All parties, as evidenced by the electronic signatures below, are in agreement to this
18 extension of time.

19 Respectfully submitted this 20th day of May, 2021.

20
21 CONDON & FORSYTH LLP

22 /s/ Bartholomew J. Banino
23 Bartholomew J. Banino, NY Bar No. 2906568
24 Admitted *Pro Hac Vice*
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Attorneys for Defendant/Cross-Claim Defendant

JOINT MOTION TO EXTEND DEADLINES- 2
(CASE NO. 2:19-cv-01966-BAT)

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Hawaiian Airlines Inc.

FAIN ANDERSON VANDERHOEF
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/s/ Jeremiah R. Newhall
On behalf of: Eron Z. Cannon, WSBA No. 42706
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Attorneys for Defendants/Cross-Claim Plaintiffs
Expeditors International NZ Ltd. and
Expeditors International of Washington Inc.

1 **ORDER**

2 The parties having so stipulated, and the Court finding good cause for entry hereof,

3 NOW THEREFORE, IT IS HEREBY ORDERED that the case schedule be reset in
4 accordance with the above listed dates.

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6 Dated this 21st day of May, 2021.

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9 BRIAN A. TSUCHIDA
10 United States Magistrate Judge

11 Presented by:

12 /s/ Bartholomew J. Banino
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19 Attorneys for Defendant/Cross-Claim Defendant
20 Hawaiian Airlines Inc.

21 /s/ Jeremiah R. Newhall
22 On behalf of: Eron Z. Cannon, WSBA No. 42706
23 Jeremiah R. Newhall, WSBA No. 54959
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JOINT MOTION TO EXTEND DEADLINES- 4
(CASE NO. 2:19-cv-01966-BAT)

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Expeditors International of Washington Inc.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date below, I electronically filed the foregoing document with
3 the Clerk of the Court using the CM/ECF system, which will send notification of such filing to
4 the following:

5 ***Counsel for Plaintiff***
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12 Kelly A. Mennemeier, WSBA No.51838
13 FOSTER GARVEY PC
14 1111 Third Avenue, Suite 3000
15 Seattle, WA 98101-3292

16 Signed at Seattle, Washington this 20th day of May, 2021.

17 /s/ Sydney M. McCrorie
18 Sydney M. McCrorie, *Legal Assistant*