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THE HONORABLE RICARDO S. MARTINEZ

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

TODD HAGEN,

Plaintiff,

vs.

SAFEWAY, INC., a Delaware Corporation,

Defendant.

No. 2:20-cv-00134-RSM

STIPULATION FOR AND
AGREED ORDER AMENDING
TRIAL DATE AND CASE
SCHEDULE

I. STIPULATION

The parties stipulate and agree as follows:

1. The parties' joint status report in this matter was filed on March 2, 2020, just before the courts began issuing pandemic-related orders and just before the governor began issuing stay at home orders.

2. The parties have endeavored to continue with discovery but discovery has definitely been delayed as a result of the pandemic. The parties need additional time to comply with discovery deadlines and to prepare for trial. The deposition of the plaintiff is scheduled to take place on October 26, 2020. The parties need additional time for a

STIPULATION FOR AND AGREED
ORDER AMENDING TRIAL DATE
AND CASE SCHEDULE - 1

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trial date.wpd



Turner Kugler Law,
PLLC

6523 California Ave SW #454
Seattle, WA 98136
(206) 659-0679

1 Rule 35 physical examination, to prepare and disclose expert reports and to complete
2 other discovery.

3 3. The parties have not previously requested a continuance.

4 4. The parties jointly request that the court enter the subjoined order and
5 amend its order setting trial date and related dates (dkt. #7) by setting the following new
6 dates:

7	Disclosure of expert testimony	January 8, 2021
8	Deadline for filing motions related to discovery	January 28, 2021
9	Discovery completed by	February 26, 2021
10	Dispositive motion filing deadline	March 19, 2021
11	Mediation per LCR 39.1(c)(3)	April 16, 2021
12	Motion in limine filing deadline	May 26, 2021
13	Agreed pretrial order due	June 9, 2021
14	Trial briefs, proposed voir dire, jury instructions, neutral statement of the case, trial exhibits	June 16, 2021
15	Trial	June 21, 2021

16 Dated: October 13, 2020.

17 DIXON & CANNON, LTD.

18 By: s/ James R. Dixon
19 James R. Dixon, WSBA # 18014
20 Attorney for Plaintiff

21 TURNER KUGLER LAW, PLLC

22 By: s/ John T. Kugler
23 John T. Kugler, WSBA # 19960
24 Attorney for Defendant

25



II. ORDER

The court has reviewed the foregoing stipulation of the parties and ORDERS that the original order setting trial date and related dates (dkt. #7) is amended as follows:

Disclosure of expert testimony	January 8, 2021
Deadline for filing motions related to discovery	January 28, 2021
Discovery completed by	February 26, 2021
Dispositive motion filing deadline	March 19, 2021
Mediation per LCR 39.1(c)(3)	April 16, 2021
Motion in limine filing deadline	May 26, 2021
Agreed pretrial order due	June 9, 2021
Trial briefs, proposed voir dire, jury instructions, neutral statement of the case, trial exhibits	June 16, 2021
Trial	June 21, 2021

DATED: October 13, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE



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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff:
James Dixon
Dixon & Cannon, Ltd.
601 Union St., Ste. 3230
Seattle, WA 98101
(206) 957-2247
james@dixoncannon.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

<u>T. Kugler</u>	<u>s/ John</u>
KUGLER, WSB #19960	JOHN T.
Defendant Safeway Inc.	Attorney for
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