The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WESTERN TOWBOAT COMPANY,

Plaintiff,

Case No. 2:20-cv-00416-RSM

V.

STIPULATED MOTION TO EXTEND FED. R. CIV. P. 54 / LCR 54(d)(1)

DEADLINES

Defendant.

File Date: January 13, 2022

The parties, Vigor Marine, LLC ("Vigor") and Western Towboat Company ("Western"), by and through their undersigned counsel of record, jointly move that this Court order that the deadlines of Fed. R. Civ. P. 54 / LCR 54(d)(1) for filing a bill of costs and any necessary affidavits or evidence substantiating the amount and reasonableness of recoverable attorney fees (if the Court determines either party is entitled to same) be extended to 21 days after either:

- 1. The passing of the last date to note any appeal pursuant to Federal Rule of Appellate Procedure 4 of this Court's January 7, 2022 Final Judgment [ECF 115], with no appeal so noted; or
 - 2. If appeal is so noted, within 21 days after the issue of a mandate of the

STIPULATED MOTION TO EXTEND FED. R. CIV. P. 54 / LCR 54(D)(1) DEADLINES - 1

1	United States Court of Appeals or dismissal of appeal and remand to this Court by the
2	United States Court of Appeals, or if certiorari is petitioned to the Supreme Court of the
3	States, the date of the denial of the petition of certiorari, or if the petition is granted, of the
4	final decision and any remand to this Court of the Supreme Court of the United States.
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6	IT IS SO STIPULATED:
7	Dated this 13th day of January, 2022.
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9	SCHWABE, WILLIAMSON & WYATT, P.C.
10	\mathbf{p}_{-} , \mathbf{p}_{-} , \mathbf{p}_{-} , \mathbf{p}_{-} , \mathbf{p}_{-} , \mathbf{p}_{-}
11	By: <u>/s/ David R. Boyajian</u> David R. Boyajian, WSBA #50195 Email: dboyajian@schwabe.com
12	Noah Jarrett, WSBA #31117 Email: njarrett@schwabe.com
13	Adam P. Murray, WSBA #48553 Email: amurray@schwabe.com
14	Molly J Henry, WSBA #40818 Email: mhenry@schwabe.com
15	Christopher H. Howard, WSBA #11074 Email: choward@schwabe.com
16	Attorneys for Vigor Marine, LLC
17	
18	Dated this 13th day of January, 2022.
19	GASPICH LAW OFFICE PLLC
20	
21	By: <u>/s/ Anthony J. Gaspich</u> Anthony J. Gaspich, WSBA #19300
22	Email: tony@gaspichwilliams.com
23	Co-Counsel for Plaintiff Western Towboa Company
24	
25	
26	
	STIPULATED MOTION TO EXTEND FED. R. CIV. P. 54 / LCR 54(D)(1)

1	Dated this 13th day of January, 2022.
2	SIMMS SHOWERS LLP
3	
4	By: <u>/s/ J. Stephen Simms</u> J. Stephen Simms, <i>Pro Hac Vice</i>
5	Email: jssimms@simmsshowers.com
6	Email: jssimms@simmsshowers.com Co-Counsel for Plaintiff Western Towboat Company
7	
8	
9	
10	APPROVED AND SO ORDERED this 14th day of January, 2022.
11	ATTROVED AND 50 ORDERED this 14 day of January, 2022.
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15	RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE
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