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Western Towboat Company ("Western") and Vigor Marine's ("Vigor") move jointly to extend to February 5, 2021 (from December 30, 2020) the present case schedule deadline for disclosure of expert testimony.

As grounds for this motion, Western and Vigor state that they have engaged in discovery but the relatively complex issues of the case require further time for identification of experts and presentation of expert reports.

All other case dates would remain the same.

Western and Vigor respectfully request this Court to grant their motion and herewith submit a draft order.

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**Expert** Disclosure

Joint Motion and Order to Extend Deadline, No. 20-416 RSM - 2

Simms Showers LLP 201 International Circle Suite 230 Baltimore, Maryland 21030

Ph: 410-783-5795 Fax 410-510-1789

Dated: December 7, 2020. 1 2 GASPICH LAW OFFICE PLLC SIMMS SHOWERS LLP /s/ Anthony J. Gaspich /s/ J. Stephen Simms Anthony J. Gaspich, WSBA No. 19300 J. Stephen Simms 8094 Barthrop Pl NE 201 International Circle, Suite 230 Bainbridge Island, WA 98110 Baltimore, Maryland 21030 Tel. (206) 956-4204 Ph: 410-783-5795 Fax: (206) 956-4214 Fax 410-510-1789 tony@gaspichwilliams.com jssimms@simmsshowers.com Attorneys for Plaintiff Western Attorneys for Plaintiff Western Towboat Company Towboat Company 10 11 SCHWABE, WILLIAMSON & WYATT, P.C. 12 13 By: /s/ David R. Boyajian David R. Boyajian, WSBA #50195 14 Email: dboyajian@schwabe.com 15 Noah Jarrett, WSBA #31117 16 Email: njarrett@schwabe.com 1211 SW 5th Ave., Suite 1900 17 Portland, OR 97204 18 Attorneys for Defendant Vigor 19 Marine, LLC 20 Joint Motion and 21 Simms Showers LLP Order to Extend 201 International Circle 22 Expert Suite 230 Baltimore, Maryland 21030 Disclosure Ph: 410-783-5795 23 Fax 410-510-1789 Deadline, No. 20-416 RSM - 3 24

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## **ORDER**

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

NOW, THEREFORE, IT IS HEREBY ORDERED that the date for disclosure of expert testimony shall be extended to February 5, 2021, all other dates in the Order Setting Trial and Related Dates (dkt 14) remaining the same.

Dated this 8th day of December, 2020.

RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE

Joint Motion and Order to Extend Expert Disclosure Deadline, No. 20-416 RSM - 4

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416 RSM - 5	

Approved as to form; 1 Notice of presentation waived 2 SCHWABE, WILLIAMSON & WYATT, P.C. By: /s/ David R. Boyajian David R. Boyajian, WSBA #50195 Email: dboyajian@schwabe.com Noah Jarrett, WSBA #31117 Email: njarrett@schwabe.com 1211 SW 5th Ave., Suite 1900 Portland, OR 97204 10 Attorneys for Defendant Vigor Marine, LLC 11 12 13 **CERTIFICATE OF SERVICE** 14 I hereby certify that on December 7, 2020, I caused the foregoing to be filed 15 16 on this Court's CM/ECF system for service on all record counsel. 17 /s/ J. Stephen Simms 18 19 20 Joint Motion and 21 Simms Showers LLP Order to Extend 201 International Circle 22 Expert Suite 230 Baltimore, Maryland 21030 Disclosure Ph: 410-783-5795 23 Fax 410-510-1789 Deadline, No. 20-416 RSM - 6 24 25