

1 THE HONORABLE BARBARA ROTHSTEIN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

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14 WILDWOOD TOWNHOMES OWNERS
15 ASSOCIATION, a Washington Non-Profit
16 Corporation,

17 Plaintiff,

v.

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19 AMERICAN FAMILY MUTUAL
20 INSURANCE COMPANY, S.I., a Wisconsin
21 Corporation; and DOE INSURANCE
22 COMPANIES 1-10,

23 Defendants.

24 No.: 2:21-cv-01080-BJR

25 STIPULATED MOTION AND ORDER
26 CONTINUING TRIAL DATE AND
PRETRIAL LITIGATION DEADLINES

27 Plaintiff Wildwood Townhomes Owners Association (the “Association”) and
28 Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this
29 motion for a continuance of the trial date and pre-trial deadlines and respectfully request a
30 short extension of the trial date and pre-trial deadlines by two months.

31 Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause
32 and with the judge’s consent.” Good cause exists here because the parties have agreed to
33 enter into a second mediation of this matter. For purposes of judicial economy, the parties
34 propose that the pretrial deadlines be continued for sixty days to avoid incurring additional
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36 STIPULATED MOTION AND ORDER FOR CONTINUING
37 TRIAL DATE AND PRETRIAL LITIGATION DEADLINES - 1
38 NO.: 2:21-CV-01080-BJR

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1 expenses on behalf of the parties should the matter resolve during mediation. This extension
 2 is not made for purposes of delay, but rather to permit the parties additional time in an
 3 attempt to resolve this matter amicably without incurring substantial further costs or
 4 requiring additional time and resources on behalf of the Court. The parties respectfully
 5 request that the Court extend the currently scheduled deadline as set forth Below. A proposed
 6 order is included herewith.

Event	Current Deadline	New Deadline
Discovery completed by	12/6/2022	2/5/2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	1/6/2023	3/7/2022
Motions in Limine	1/30/2023	3/31/2023
Joint Pretrial Statement	3/22/2023	5/22/2023
Pretrial Conference	4/11/2023	6/11/2023
Jury Trial	4/24/2023	6/24/2023

15 The Parties believe that there is good cause under Federal Rule of Civil Procedure
 16 6(b) and Local Civil Rule 10(g) for a continuance of the trial date and related pretrial
 17 deadlines due to the reasons set forth above.

1 DATED: November 10, 2022

2 Lane Powell PC

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9 Attorneys for Plaintiff Wildwood
10 Townhomes Owners Association

ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the pretrial deadlines be extended as follows:

Event	Current Deadline	New Deadline
Discovery completed by	12/6/2022	2/5/2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	1/6/2023	3/7/2022
Motions in Limine	1/30/2023	3/31/2023
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Pretrial Conference	4/11/2023	6/11/2023
Jury Trial	4/24/2023	6/24/2023

No other deadlines or events are altered.

Dated this 21st day of November, 2022.

Barbara J. Rothstein
The Honorable Barbara J. Rothstein
United States District Judge