

The Honorable Barbara J. Rothstein

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

LUCY W. KAIRU,
Plaintiff,
v.
THE UNITED STATES OF AMERICA,
Defendant.

Case No. 2:22-cv-00154-BJR

STIPULATED MOTION AND ORDER
FOR EXTENSION OF PRETRIAL
DEADLINES

JOINT STIPULATION

The parties hereby jointly STIPULATE AND AGREE to extend the following trial date and related dates as set forth in the Court's June 30, 2022 Order Setting Trial Date and Related Dates (Dkt. 12), as set forth below.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Reports from expert witness under FRCP 26(a)(2) due	November 28, 2022	December 28, 2022
Discovery completed by	December 28, 2022	February 28, 2023
All dispositive motions must be filed by	January 27, 2023	March 28, 2023

23 Good cause exists for extending these specific deadlines. Although the parties have
24 conducted extensive fact discovery to date, including exchanging written discovery, setting and

STIPULATED MOTION AND [PROPOSED] ORDER FOR
EXTENSION OF PRETRIAL DEADLINES
[2:22-cv-00154-BJR] - 1

UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
206-553-7970

1 taking depositions, and collecting thousands of pages of medical records, the parties need
2 additional time before expert witnesses can be disclosed. Due to holiday schedules, the timing of
3 when new medical records were received from medical facilities, and the significant volume of
4 records, the parties' experts need additional time to review records and prepare their expert reports.
5 The parties anticipate that an additional month will be sufficient for their experts to finalize their
6 reports. The parties reasonably anticipate that rebuttal experts will be named and an extension of
7 the close of discovery by two months will allow the parties time to depose any rebuttal experts
8 prior to the close of discovery.

9 For the reasons set forth above, the parties believe that there is good cause to request an
10 extension of the above-listed trial date and related dates and respectfully request that the Court
11 grant their motion.

12 **SO STIPULATED.**

13 Dated this 15th day of November, 2022.

14 NICHOLAS W. BROWN CMG LAW
15 United States Attorney

16 *s/ Whitney Passmore* WHITNEY PASSMORE, FL No. 91922

17 *s/ Nickolas Bohl*
18 NICKOLAS BOHL, WSBA No. 48978
Assistant United States Attorneys
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: whitney.passmore@usdoj.gov
Email: nickolas.bohl@usdoj.gov

23 *Attorneys for United States of America*

16 *s/ Tyler Goldberg-Hoss*
TYLER GOLDBERG-HOSS, WSBA No. 41653
115 NE 100th Street, Ste. 220
Seattle, WA 98125
Phone: 206-443-8600
Email: tyler@cmglaw.com

20 *Attorney for Plaintiff*

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ORDER

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3 It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial deadlines
are as follows:

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<u>Deadlines</u>	
Reports from expert witness under FRCP 26(a)(2) due	December 28, 2022
Discovery completed by	February 28, 2023
All dispositive motions must be filed by	March 28, 2023

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7 DATED this 18th day of November, 2022.

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