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The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SIXTY-01 ASSOCIATION OF
APARTMENT OWNERS, a Washington
non-profit corporation,,

Plaintiff,

v.

PUBLIC SERVICE INSURANCE
COMPANY; GREAT LAKES
INSURANCE, SE; ASPEN SPECIALTY
INSURANCE COMPANY; IRONSHORE
SPECIALTY INSURANCE COMPANY;
LIBERTY SURPLUS INSURANCE
COMPANY; ALTERRA EXCESS &
SURPLUS INSURANCE COMPANY;
INDIAN HARBOR INSURANCE
COMPANY; STARR SURPLUS LINES
INSURANCE COMPANY; HOMELAND
INSURANCE COMPANY OF NEW
YORK; CERTAIN UNDERWRITERS AT
LLOYD’S, LONDON (BRIT SYNDICATE
2987); and ARCH SPECIALTY
INSURANCE COMPANY,

Defendants.

Civil Action No. 2:22-cv-01373-JCC

**STIPULATION REQUESTING
EXTENSION OF DISCOVERY CUTOFF
AND RELATED DEADLINES and
PROPOSED ORDER**

Stipulation Requesting Extension of Discovery Cutoff
and Related Deadlines
(No. 2:22-cv-01373 JCC)

McCormick Barstow, LLP
Scripps Center, Suite 1050
312 Walnut Street
Cincinnati, Ohio 45202
(513) 62-7520

1 I. STIPULATION

2 Defendant Public Service Insurance Company (“PSIC”) and Plaintiff Sixty-01 Association
3 of Apartment Owners (“Association”) have conferred regarding the discovery deadlines
4 previously stipulated to (Dkt. #166), and as amended by the Court on December 8, 2023 (Dkt.
5 #167). In light of the current stay and lack of a trial date, the parties are in agreement that it is in
6 the best interest of both parties to extend all current discovery deadlines by sixty (60) days.
7 Accordingly, the parties propose and agree to amend the deadlines, as follows:
8

<u>Date</u>	<u>Event</u>
May 14, 2024	Last day to disclose expert witnesses
June 4, 2024	Last day to submit expert disclosure rebuttals
June 24, 2024	Deadline to file discovery-related motions
June 24, 2024	Discovery cutoff

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15 DATED: March 12, 2024

16 Ashbaugh Beal

McCORMICK BARSTOW LLP

17 By: /s/ Jesse D. Miller

By: /s/ Patrick Fredette

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Attorneys for Defendant Public Service
Insurance Company

1 **II. ORDER**

2 Having considered the stipulation and facts therein, the Court hereby grants the stipulated
3 extension of all pending discovery deadlines.

4 IT IS SO ORDERED

5 DATED this 13th day of March, 2024.

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JUDGE JOHN C. COUGHENOUR
9 United States District Judge

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11 Presented by:

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14 ASHBAUGH BEAL

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1 **PROOF OF SERVICE**

2 **Sixty-01 Association of Apartment Owners v. Public Service Ins. Co.**
3 **Case No. 22-cv-01373-JCC**

4 **STATE OF CALIFORNIA, COUNTY OF FRESNO**

5 At the time of service, I was over 18 years of age and **not a party to this action**. I am
6 employed in the County of Fresno, State of California. My business address is 7647 North Fresno
7 Street, Fresno, CA 93720.

8 On March 12, 2024, I served true copies of the following document(s) described as
9 **STIPULATION REQUESTING EXTENSION OF DISCOVERY CUTOFF AND**
10 **RELATED DEADLINES and PROPOSED ORDER** on the interested parties in this action as
11 follows:

12 **SEE ATTACHED SERVICE LIST**

13 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
14 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case
15 who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case
16 who are not registered CM/ECF users will be served by mail or by other means permitted by the
17 court rules.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct and that I am employed in the office of a member of the bar of this
20 Court at whose direction the service was made.

21 Executed on March 12, 2024, at Fresno, California.

22 

23 _____
24 Heather Ward

1 **SERVICE LIST**
2 **Sixty-01 Association of Apartment Owners v. Public Service Ins. Co.**
3 **Case No. 22-cv-01373-JCC**

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