1 Honorable Robert J. Bryan 2 3 5 6 7 UNITED STATES DISTRICT COURT 8 FOR THE WESTERN DISTRICT OF WASHINGTON 9 AT TACOMA 10 ANN HENEGHAN, individually, and as Personal Representative of the Estate of 11 CATHLEEN DELIA ROSS, and JOHN NO. 3:10-cv-05908-RJB ROSS, individually, 12 STIPULATION TO ADJUST Plaintiffs, PRETRIAL DEADLINES 13 NOTED FOR CONSIDERATION: 14 vs. JANUARY 13, 2012 CROWN CRAFTS INFANT PRODUCTS, 15 INC., d/b/a/ NOEL JOANNA, INC., a Delaware Corporation; WILLIAM SEARS, 16 M.D. d/b/a SEARS PEDIATRICS AND FAMILY MEDICINE, INC., a California 17 corporation, 18 Defendants. 19 20 The parties hereby stipulate to adjust pre-trial deadlines as set forth below, subject to the Court's approval of the proposed new deadlines: 21 1. This matter is set for trial on June 4, 2012. The current date to complete 22 23 discovery is February 6, 2012. The current date for filing dispositive motions is March 6, 2012. The parties exchanged expert disclosures pursuant to FRCP 24 25 26(a)(2) on December 12, 2011. Be tts STIPULATION TO ADJUST PRETRIAL Patte rso n **DEADLINES**

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1	2. Due to the intervening Holidays, and the schedules of counsel, the parties cannot
2	complete discovery by February 6, 2012. The parties wish to continue
3	deposition discovery through February 29, 2012. As expert discovery will
4	continue beyond February 6, 2012, the parties wish to adjust the deadline for
5	filing dispositive motions to March 12, 2012.
6	3. The parties do not believe these adjustments should require a change in the trial
7	date, and request the Court to approve the proposed adjustments pursuant to CR
8	16(f) and (g).
9	4. In summary, the parties request that the deadline for the completion of discovery
10	be extended through February 29, 2012, and that the deadline for filing
11	dispositive motions be extended to March 12, 2012.
12	DATED this 13th day of January, 2012.
13	DATED this 13th day of January, 2012.
14	CONNELLY LAW OFFICES BETTS, PATTERSON & MINES, P.S.
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16	By s/ Micah R. LeBank By s/ Christopher W. Tompkins
17	Micah R. LeBank, WSBA #38047 Christopher W. Tompkins, WSBA #11686 Attorneys for Plaintiffs Attorneys for Defendants
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<u>ORDER</u> 1 Pursuant to the foregoing Stipulation, it is hereby 2 ORDERED, ADJUDGED AND DECREED that the deadline for the completion of 3 discovery is extended through February 29, 2012, and that the deadline for filing dispositive 4 motions is extended to March 12, 2012. All other dates in the current scheduling order shall 5 remain unchanged. 6 DATED this 17th day of January, 2012. 7 8 9 ROBERT J. BRYAN 10 United States District Judge 11 12 Presented by: 13 BETTS, PATTERSON & MINES, P.S. 14 15 16 By s/Christopher W. Tompkins Christopher W. Tompkins, WSBA #11686 17 Attorneys for Defendants 18 Approved as to form; Notice 19 of Presentation waived: 20 **CONNELLY LAW OFFICES** 21 22 23 By s/Micah R. LeBank Micah R. LeBank, WSBA #38047 24 Attorneys for Plaintiffs

STIPULATION TO ADJUST PRETRIAL DEADLINES

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