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Honorable Robert J. Bryan

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

ANN HENEGHAN, individually, and as
Personal Representative of the Estate of
CATHLEEN DELIA ROSS, and JOHN
ROSS, individually,

Plaintiffs,

vs.

CROWN CRAFTS INFANT PRODUCTS,
INC., d/b/a/ NOEL JOANNA, INC., a
Delaware Corporation; WILLIAM SEARS,
M.D. d/b/a SEARS PEDIATRICS AND
FAMILY MEDICINE, INC., a California
corporation,

Defendants.

NO. 3:10-cv-05908-RJB

STIPULATION TO ADJUST
PRETRIAL DEADLINES

NOTED FOR CONSIDERATION:
JANUARY 13, 2012

The parties hereby stipulate to adjust pre-trial deadlines as set forth below, subject to
the Court's approval of the proposed new deadlines:

1. This matter is set for trial on June 4, 2012. The current date to complete
discovery is February 6, 2012. The current date for filing dispositive motions is
March 6, 2012. The parties exchanged expert disclosures pursuant to FRCP
26(a)(2) on December 12, 2011.

STIPULATION TO ADJUST PRETRIAL
DEADLINES

NO. 3:10-cv-05908-RJB
518930/011712 1258/55910094

Be tts
Pa tte rso n
Mine s
One Convention Place
Suite 1400
701 Pike Stre et
Se a ttle , Wa shing to n 98101-3927
(206) 292-9988

- 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.

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14 CONNELLY LAW OFFICES

BETTS, PATTERSON & MINES, P.S.

15
16 By s/ Micah R. LeBank
17 Micah R. LeBank, WSBA #38047
18 Attorneys for Plaintiffs

By s/ Christopher W. Tompkins
Christopher W. Tompkins, WSBA #11686
Attorneys for Defendants

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STIPULATION TO ADJUST PRETRIAL
DEADLINES

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Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
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