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HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CHARLES REED,

Plaintiff,

v.

STEVEN HAMMOND, *et al.*,

Defendants.

No.: 3:16-cv-05993-BHS-DWC

**STIPULATED MOTION AND
AGREED ORDER FOR LIMITED
REOPENING OF DISCOVERY**

I. STIPULATED MOTION

The parties stipulate and agree to a limited reopening of discovery for the purpose of exchanging Plaintiff Charles Reed’s medical records from the Department of Corrections preceding his release in 2023 that have not already been produced, as well as his medical records from the Veteran’s Association Hospital where he has been seeking care since his release. All documents are to be timely exchanged following this Stipulation being granted by the Court. The parties further stipulate and agree that the documents exchanged may be provided to their witnesses designated as experts for the purposes of supplementing any expert report, the supplement of which must be exchanged no later than October 4, 2024. The parties further stipulate and agree that should this exchange of information and supplemented reports not be reasonably possible prior to October 4, 2024, that the parties will promptly request the Court for a short trial continuance.

STIPULATION AND ORDER FOR LIMITED
REOPENING OF DISCOVERY
(NO.: 3:16-CV-05993-BHS-DWC - 1

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1 DATED this 6th day of September, 2024

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Attorneys for Defendants

1 **II. ORDER**

2 Pursuant to the Parties' stipulation, it is so ordered.

3
4 DATED this 6th day of September, 2024.

5 

6
7 BENJAMIN H. SETTLE
8 United States District Judge

9 STIPULATED AND PRESENTED this 6th day of September, 2024, by:

10
11 K&L GATES LLP

12 By: *s/ Monica A. Romero*
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 6, 2024, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system, which will send notice to all parties and
4 counsel of record.

5
6 Dated at Seattle, Washington, on September 6, 2024.

7 s/ Monica A. Romero