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The Honorable Benjamin H. Settle

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

SHERRI I. DEEM, INDIVIDUALLY AND AS  
PERSON REPRESENTATIVE OF THE  
ESTATE OF THOMAS A. DEEM,

Plaintiff,

v.

ARMSTRONG INTERNATIONAL, INC., ET  
AL.,

Defendants.

Case No. 3:17-cv-05965-BHS

STIPULATED MOTION AND ORDER TO  
EXTEND DEADLINES ON EXPERT  
DISCLOSURES, DISCOVERY CUT-OFF  
AND DEPOSITIONS OF PLAINTIFF'S  
FAMILY MEMBERS

**STIPULATED MOTION**

COMES NOW counsel for Defendant John Crane Inc. ("JCI"), on the one hand, and  
counsel for Plaintiffs Sherri L. Deem, individually and as Personal Representative of the Estate  
of Thomas A. Deem ("Plaintiff"), on the other hand, and hereby moves this Court to enter an  
Order allowing 1) expert disclosure deadlines for Defendants to be due January 4, 2023, 2) the  
deadline for discovery to be completed to January 4, 2023 and 3) that depositions of Plaintiff's  
family members may be taken after the discovery cut-off of January 4, 2023, but prior to the due

STIPULATED MOTION TO EXTEND DEADLINES  
Case No.: 3:17-cv-05965-BHS - 1

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1 date of the pre-trial order. The previously entered orders on stipulations specifically relating to  
2 the deposition of Dr. Ronald Gordon (Dkt. 251) and all expert, lay, fact and corporate  
3 representative witnesses of JCI (Dkt.225) remain in effect. Those stipulations allow the  
4 aforementioned depositions be completed after the discovery cut-off, which would now be  
5 January 4, 2023.

6 Defendant JCI has notified all Defendants in this case of this stipulation and proposed  
7 order and have been told they have no objections.

8 Dated this 30<sup>th</sup> day of November 2022.

9  
10 /s/ Daira Waldenberg  
Daira Waldenberg, WSBA #27469  
11 600 University Street, Suite 1800  
Seattle, WA 98101-4129  
12 dwaldenberg@selmanlaw.com  
13 *Attorneys for Defendant JOHN CRANE  
INC*

/s/ Lucas Garrett (signed by Daira  
Waldenberg with permission)  
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15 David Humen (Pro Hac Vice)  
Dean Omar Branham, LLP  
16 302 North Market Street, Suite 300  
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17 *Attorneys for Plaintiff*

18  
19 **ORDER**

20 Based upon the foregoing Stipulated Motion, it is hereby ORDERED that Defendants  
21 Expert Disclosures are now due January 4, 2023, the deadline to complete discovery in this case  
22 is now January 4, 2023 and depositions of Plaintiff's family members may be taken after the  
23 discovery cut-off of January 4, 2023, but prior to the due date of the pre-trial order.

24 //

25 //

26  
STIPULATED MOTION TO EXTEND DEADLINES  
Case No.: 3:17-cv-05965-BHS - 2

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1 DATED this 5th day of December, 2022.

2 

3  
4 BENJAMIN H. SETTLE  
5 United States District Judge

6 Presented by:

7  
8 /s/ Daira Waldenberg

9 Daira Waldenberg, WSBA #27469  
10 600 University Street, Suite 1800  
11 Seattle, WA 98101-4129  
12 dwaldenberg@selmanlaw.com

*Attorneys for Defendant JOHN CRANE INC.*

13 /s/Lucas Garrett (signed by Daira Waldenberg  
14 with permission)

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26 *Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2022 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record who receive CM/ECF notification.

*/s/ Emily Rose* \_\_\_\_\_

Emily Rose