

Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HANNA J. McANDIE,

Plaintiff(s),

V.

SEQUIM SCHOOL DISTRICT, ROBERT CLARK, and his marital community,

Defendant(s).

NO. 3:21-cv-05227-JHC

STIPULATED MOTION FOR
EXTENSION OF DISCOVERY
DEADLINE

NOTE ON MOTION CALENDAR:
Monday, August 1, 2022

JOINT STIPULATION

Defendants Sequim School District (“the District”), Dr. Robert Clark (“Defendant Clark”) and plaintiff Hanna McAndie (“Plaintiff”), through their undersigned attorneys, stipulate and agree that the deadline for the completion of discovery be extended from November 28, 2022 to December 16, 2022. Plaintiff requested, and Defendants agreed to, this extension of time due to the fact that the parties have scheduled mediation for November 3, 2022, counsel for Plaintiff has a trial beginning on November 15, 2022, and scheduling challenges associated with completing the remaining depositions and discovery prior to the current deadline.

STIPULATED MOTION FOR EXTENSION OF DISCOVERY
DEADLINE - 1
05769-1402-A 5823391
NO. 3:21-cv-05227

PREG O'DONNELL & GILLETT PLLC
901 FIFTH AVE., SUITE 3400
SEATTLE, WASHINGTON 98164-2026
TELEPHONE: (206) 287-1775 • FACSIMILE: (206) 287-9113

SO STIPULATED.

Dated this 1st day of August, 2022.

GALLAGHER LAW OFFICE P.S.

By /s/Daniel Gallagher

Daniel C. Gallagher, WSBA #21940

Gallagher Law Office P.S.

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Attorney for Plaintiff

STIPULATED MOTION FOR EXTENSION OF DISCOVERY
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ORDER

IT IS SO ORDERED.

Dated this 2nd day of August, 2022.

John H. Chan

Hon. John H. Chun
United States District Judge

STIPULATED MOTION FOR EXTENSION OF DISCOVERY
DEADLINE - 4
05769-1402-A 5823391
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DECLARATION OF SERVICE

I hereby certify that on this 1st day of August, 2022, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Counsel for Plaintiff:

Daniel C. Gallagher
Gallagher Law Office P.S.
dan@nwprolaw.com

Counsel for Defendant Robert Clark:

Lori M. Bemis, Esq.
McGavick Graves, P.S.
lmb@mcgavick.com

DATED at Seattle, Washington, this 1st day of August, 2022.

/s/Jeanne Perrin

Jeanne A. Perrin
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STIPULATED MOTION FOR EXTENSION OF DISCOVERY
DEADLINE - 5
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NO. 3:21-cv-05227

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