

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 & GILLET** PLLC

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1 **SO STIPULATED.**

2 **Dated this 1<sup>st</sup> day of August, 2022.**

3 PREG O'DONNELL & GILLETT, PLLC

4 By /s/Emma Gillespie

5 Emma Gillespie, WSBA #33255

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11 Attorneys for Defendants Sequim School District

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13 By /s/Kelsey Norman

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21 Attorneys for Defendants Sequim School District

22 **SO STIPULATED.**

23 **Dated this 1<sup>st</sup> day of August, 2022.**

24 MCGAVICK GRAVES, P.S.

25 By /s/Lori Bemis

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Attorney for Defendant Robert Clark

1 **SO STIPULATED.**

2 **Dated this 1<sup>st</sup> day of August, 2022.**

3 GALLAGHER LAW OFFICE P.S.

4 By /s/Daniel Gallagher

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11 Attorney for Plaintiff

**ORDER**

**IT IS SO ORDERED.**

Dated this 2nd day of August, 2022.



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Hon. John H. Chun  
United States District Judge

**DECLARATION OF SERVICE**

I hereby certify that on this 1<sup>st</sup> 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  
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**Counsel for Defendant Robert Clark:**

Lori M. Bemis, Esq.  
McGavick Graves, P.S.  
[lmb@mcgavick.com](mailto:lmb@mcgavick.com)

DATED at Seattle, Washington, this 1<sup>st</sup> day of August, 2022.

/s/Jeanne Perrin

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