

The Honorable Tiffany M. Cartwright

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

AMANDA DODS,

Plaintiff,

v.

UNITED STATES OF AMERICA and
UNITED STATES POSTAL SERVICE,

Defendants.

Case No. 3:24-cv-05170-TMC

STIPULATED MOTION AND
ORDER FOR
EXTENSION OF PRETRIAL
DEADLINES

Noted for Consideration:
March 6, 2025

The parties hereby jointly STIPULATE AND AGREE to extend the following deadlines, which were set forth in the Court's August 22, 2024, Order Setting Bench Trial and Pretrial Dates (Dkt. 16), as set forth below.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Disclosure of expert testimony under FRCP 26(a)(2)	March 24, 2025	April 7, 2025

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). The parties submit that good cause exists for extending this specific deadline.

The parties have diligently worked to complete discovery in this case, including working with

STIPULATED MOTION AND ORDER
FOR EXTENSION OF PRETRIAL DEADLINES
[Case No. 3:24-cv-05170-TMC] - 1

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1 expert witnesses in anticipation of the March 24, 2025 expert witness disclosure deadline.
2 Defendant has engaged an expert witness who will perform a functional capacity exam of Plaintiff,
3 and the parties worked to set a date for the exam. Unfortunately, the only date that works for both
4 Plaintiff and the expert is March 20, 2025. The expert will need time to complete her report, which
5 will then be given to other experts engaged by Defendant. A two-week extension of this deadline
6 will allow Defendants' experts to complete her report and to have that report reviewed by other
7 experts. A short, two-week delay will still leave time for the parties to complete discovery under
8 the current deadline so that the trial date can remain in place.

9 For the reasons set forth above, the parties believe that there is good cause to request an
10 extension of the above-listed dates and respectfully request that the Court grant their motion.

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1 SO STIPULATED.

2 DATED this 6th day of March, 2025.

3 Respectfully submitted,

4 TEAL LUTHY MILLER
Acting United States Attorney

MORGAN & KOONTZ, PLLC

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s/ Mark E. Koontz

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Attorney for Plaintiff

12 *Attorneys for United States of America*

13 *I certify that this memorandum contains 277*
14 *words, in compliance with the Local Civil Rules.*

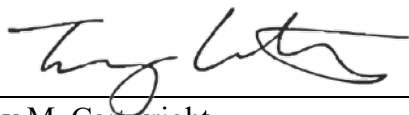
1 **ORDER**

2 It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial deadline
3 is as follows:

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<u>Deadline</u>	
5 Disclosure of expert testimony under FRCP 26(a)(2)	6 April 7, 2025

7 Dated this 10th day of March, 2025.

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11 Tiffany M. Cartwright
12 United States District Judge
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