

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

THE HONORABLE ROBERT J. BRYAN

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

ERIC KLOPMAN-BAERSELMAN, as the
Personal Representative of the Estate of
RUDIE KLOPMAN-BAERSELMAN,
deceased,

Plaintiff,

v.

AIR & LIQUID SYSTEMS
CORPORATION, et al.,

Defendants.

NO. 3:18-cv-5536-RJB

STIPULATED MOTION AND ORDER
TO EXTEND DISCOVERY FOR
TOYOTA MOTOR SALES, U.S.A.,
INC.'S DEPOSITION

NOTE ON MOTION CALENDAR:
OCTOBER 11, 2019

STIPULATION

COMES NOW Plaintiff and Defendant Toyota Motor Sales, U.S.A., Inc. (“TMS”), by and through their respective counsel, to stipulate and request the Court extend the discovery cut-off from November 1, 2019 to November 7, 2019 for TMS’s corporate representative deposition.

1. Extension is needed due to the previous deposition date being cancelled after the

LAW OFFICES OF
THE GAITÁN GROUP
A PROFESSIONAL LIMITED LIABILITY COMPANY
411 UNIVERSITY STREET, SUITE 1200
SEATTLE, WASHINGTON 98101
(206) 346-6000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

filing of a protective order.

2. Plaintiff agrees with this request and the parties do not believe this will impact the scheduled trial date set by the Court.

This stipulation has been circulated to all Defendants and as of the date this motion is filed there have been no objections.

Accordingly, the parties respectfully stipulate and request that the Court grant the extension of discovery to November 7, 2019 for the TMS corporate representative deposition.

Dated: October 10, 2019

<p>THE GAITAN GROUP</p> <p><i>s/Virginia Leeper</i></p> <hr/> <p>José E. Gaitán, WSBA No. 7347 jgaitan@gaitan-law.com Virginia Leeper, WSBA No. 10576 vleeper@gaitan-law.com John Lenker, WSBA No. 13067 jlenker@gaitan-law.com 411 University Street, Suite 1200 Seattle, WA 98101 Tel: (206) 346-6669 Attorneys for Defendant Toyota Motor Sales, U.S.A., Inc.</p>	<p>DEAN OMAR BRANHAM, LLP</p> <p><i>s/Ben Adams</i></p> <hr/> <p>Ben Adams (<i>Pro Hac Vice</i>) Dean Omar Branham, LLP 302 North Market Street, Suite 300 Dallas, Texas 75202 badams@dobllp.com Attorneys for Plaintiff</p>
--	--

LAW OFFICES OF
THE GAITÁN GROUP
A PROFESSIONAL LIMITED LIABILITY COMPANY
411 UNIVERSITY STREET, SUITE 1200
SEATTLE, WASHINGTON 98101
(206) 346-6000

ORDER

THIS MATTER having come before the Court on the stipulation of the parties, the Court GRANTS the relief requested. The deadline for taking the Toyota Motor Sales, U.S.A., Inc.'s corporate representative's deposition is November 7, 2019.

DATED this 15th day of October, 2019.



ROBERT J. BRYAN
United States District Judge

Presented by:

THE GAITAN GROUP

s/Virginia Leeper

José E. Gaitán, WSBA No. 7347

jgaitan@gaitan-law.com

Virginia Leeper, WSBA No. 10576

vleeper@gaitan-law.com

411 University Street, Suite 1200

Seattle, WA 98101

Tel: (206) 346-6669

Attorneys for Defendant Toyota Motor Sales, U.S.A., Inc.

LAW OFFICES OF
THE GAITÁN GROUP

A PROFESSIONAL LIMITED LIABILITY COMPANY
411 UNIVERSITY STREET, SUITE 1200
SEATTLE, WASHINGTON 98101
(206) 346-6000