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12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE EASTERN DISTRICT OF WASHINGTON

14  
15 PREPARED FOOD PHOTOS, INC.  
16 f/k/a ADLIFE MARKETING &  
17 COMMUNICATIONS CO., INC.,

18 Plaintiff,

19 v.

20 POOL WORLD, INC.,

21  
22 Defendant.

Civil Action No. 2:23-cv-00160-TOR

23  
24  
25 **JOINT MOTION TO  
AMEND/EXTEND SCHEDULING  
ORDER DEADLINES**

Plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing &

1 Communications Co., Inc. (“Plaintiff”) and defendant Pool World, Inc.  
2 (“Defendant”) (collectively, the “Parties”) hereby file this joint motion to amend  
3 the current Amended Jury Trial Scheduling Order (the “Scheduling Order”)  
4 [E.C.F. No. 64], and state as follows:  
5

6 1. One of Plaintiff’s primary witnesses is currently experiencing severe  
7 family medical issues. Said primary witness is necessary for discovery responses  
8 and depositions. As such, the witness is crucial to the advancement of this matter.  
9 Due to unforeseen personal circumstances, the witness is largely unavailable for  
10 the next few months.  
11

12 2. Additionally, the Parties are now re-engaging in resolution  
13 discussion.  
14

15 3. Pursuant to the current Scheduling Order, the discovery cutoff is June  
16 10, 2025.  
17

18 4. With the current cutoff, given the availability of one of Plaintiff’s  
19 primary witnesses, the Parties are concerned about not sufficiently concluding the  
20 necessary discovery to either be prepared for trial or arrive at an amicable  
21 settlement.  
22

23 5. Given the Parties’ mutual desire to amend the scheduling order, good  
24 cause exists for such amendment.  
25

6. Accordingly, the Parties request that the Court amend the Scheduling

Order setting the following dates:

<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Discovery Cut-Off	June 10, 2025	August 29, 2025
Dispositive and <i>Daubert</i> Motions	June 17, 2025	September 12, 2025
Witness Exhibit Lists	August 26, 2025	November 7, 2025
Objections to Witnesses/Exhibits	September 2, 2025	November 21, 2025
Deposition Designations (Generally)	August 26, 2025	November 7, 2025
Deposition Designations (Cross-Designations)	September 2, 2025	November 21, 2025
Objections	September 9, 2025	December 3, 2025
Motions in Limine	August 5, 2025	October 17, 2025
Joint Proposed Pretrial Order	September 22, 2025	December 19, 2025
Trial Briefs, <i>voir dire</i> , joint proposed jury instructions	September 22, 2025	December 19, 2025
Pretrial Conference	October 8, 2025	January 7, 2026
Trial	October 14, 2025	January 19, 2026

**WHEREFORE**, the Parties respectfully request that the Court enter an Order amending the Scheduling Order as described above.

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16 By: /s/ Lauren Hausman  
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21 Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Lauren Hausman

Lauren Hausman, Esq.

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