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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

CRUISE LINES INTERNATIONAL
ASSOCIATION ALASKA, *et al.*,

Plaintiffs,

v.

CITY AND BOROUGH OF
JUNEAU, ALASKA, *et al.*,

Defendants.

Case No. 1:16-cv-00008-HRH

JOINT MOTION FOR EXTENSION OF STAY OF PRETRIAL DEADLINES

Plaintiffs Cruise Lines International Association Alaska, and Cruise Lines International Association (“Plaintiffs”) and Defendants City and Borough of Juneau, Alaska and Rorie Watt (“Defendants”) (collectively, the “Parties”), for the reasons below, jointly request an extension of the stay of pretrial deadlines originally granted by this Court on March 16, 2017, for an additional thirty (30) days.

1. Plaintiffs filed their Complaint (ECF No. 1) on April 13, 2016. On May 18, 2016, Plaintiffs filed their First Amended Complaint (ECF No. 16-1) (“FAC”), which was entered on the docket on August 10, 2016 (ECF No. 28).

2. Defendants answered the FAC on October 28, 2016 (ECF No. 40).

3. On December 23, 2016, the Court entered its Scheduling and Planning Order (ECF No. 46) (the “Scheduling Order”).

4. On January 25, 2017, the Court entered the Amended Scheduling Order (ECF No. 48), based on a stipulation submitted to the Court (ECF No. 47) by the Parties to modify the Court’s then-governing scheduling and planning order.

5. On March 15, 2016, the Parties jointly moved for a stay of all pretrial deadlines for thirty (30) days to permit the Parties to engage in settlement efforts (ECF No. 49). The Court granted the joint motion, staying all pretrial deadlines through April 14, 2017 (ECF No. 50).

5. Prior to and since the filing of the Parties’ joint motion, the Parties have actively engaged in settlement discussions (as described in the concurrently-filed Joint Status Report). While the Parties have not reached consensus on all issues necessary for a settlement of the matters in dispute, the Parties continue to engage in settlement discussions and believe that the additional time requested herein may allow them to resolve this case without further litigation.

6. Because the Parties still are actively engaged in settlement efforts and because increasing litigation costs, including costs of discovery and attorney’s fees, diminish the likelihood of successful settlement, the Parties jointly request that the Court extend the stay of all pretrial deadlines, including any and all discovery deadlines, for an additional thirty (30) days, through May 21, 2017.

7. Should the Court grant the Parties’ joint motion to extend the stay of all pretrial deadlines, including discovery deadlines, for an additional thirty (30) days, through May 21, 2017, the Parties will provide the Court a joint status report outlining the status of settlement efforts as directed by the Court.

DATED: April 21, 2017

By: /s/ Kathleen E. Kraft
C. Jonathan Benner (*pro hac vice*)
Kathleen E. Kraft (*pro hac vice*)
Thompson Coburn LLP

Herbert H. Ray, Jr. (Alaska Bar No. 8811201)
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*Attorneys for Plaintiffs Cruise Line International
Association Alaska and Cruise Lines International
Association*

By: /s/ Robert P. Blasco
Robert P. Blasco (Alaska Bar No. 7710098)
Hoffman & Blasco

*Attorney for Defendants the City and Borough of
Juneau, Alaska, a municipal corporation, and Rorie
Watt, in his official capacity as City Manager
(As authorized on April 21, 2017)*

CERTIFICATE OF SERVICE

I certify that on April 21, 2017, I caused a true and correct copy of the foregoing Joint Motion For Extension of Stay of Pretrial Deadlines to be served via the Court's electronic filing system, on counsel for Defendants and upon the Honorable H. Russel Holland, Judge District Court of Alaska.

/s/ Kathleen E. Kraft

Kathleen E. Kraft

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(Proposed) Order Granting Joint Motion For Extension of Stay

Plaintiffs Cruise Lines International Association Alaska and Cruise Lines International Association and Defendants the City and Borough of Juneau, Alaska and Rorie Watt, in his official capacity as City Manager, by and through their respective counsel, filed a joint motion requesting an extension of the stay of pretrial deadlines while the parties continue settlement efforts. In the interests of maintaining an orderly, efficient, and less costly resolution to this

dispute, the Court hereby **GRANTS** the joint motion. All pretrial deadlines, including all discovery deadlines, are stayed for an additional thirty (30) days, until and through May 21, 2017.

Dated: _____

H. Russel Holland
United States District Court Judge