IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

FELD ENTERTAINMENT, INC.,))
Plaintiff,))) Civil Action No. 07-1532 (EGS/JMF)
v.)
ANIMAL WELFARE INSTITUTE, et al.,))
Defendants.	

CONSENT MOTION TO ADJUST PRE-TRIAL SCHEDULE

Pursuant to the Court's order dated August 8, 2013, ECF No. 156, the parties to this motion, through undersigned counsel, hereby jointly move for an adjustment to the pre-trial schedule entered in this case and in support thereof state as follows:

The pre-trial schedule currently in effect in this case was established by order dated August 8, 2013, ECF No. 157 at 1-2. The dates set forth in that order for the various events leading to trial were the product of discussions and agreement among the parties. The discussions and agreement among the parties as to the pre-trial schedule occurred in a meeting and through correspondence in May 2013, and the agreed-upon schedule was filed with the Court on May 24, 1013. ECF No. 152. The specific dates proposed in the agreed schedule were

¹ Pursuant to LCvR 7(m), counsel for plaintiff consulted with counsel for the defendants Animal Welfare Institute, The Fund For Animals, Born Free USA, The Humane Society of the United States, Wildlife Advocacy Project, Meyer Glitzenstein & Crystal, Katherine Meyer, Eric Glitzenstein, Howard Crystal, Jonathan Lovvorn and Kimberly Ockene who all join in and consent to the relief sought by this application. Defendant Tom Rider became deceased on or about October 1, 2013, and no successor has yet been substituted. Counsel for Mr. Rider take the position that they no longer represent a party in this case.

based on the assumption that the pretrial schedule would be approved and entered by the Court on or about June 1, 2013. However, the order that was entered approving the pre-trial schedule was entered on August 8, 2013, ECF No. 157 at 1-2.

In the order accompanying the issuance of this pre-trial schedule, the Court observed that "[t]he Court appreciates that there has been a delay in the issuance of this Order due to the press of other business. If the deadlines to which the parties have agreed now require adjustment, the Court will certainly consider revising them upon the parties' joint application." Order at 9 (08/08/13), ECF No. 156 at 9. Accordingly, the parties jointly request that two (2) months be added to the dates in the existing schedule to account for the two (2) month delay in the issuance of the order approving the pre-trial schedule. The revised deadlines requested are as follows:

Event	Current Deadline	Revised Deadline
Deadline for amendments to pleadings and/or joinder of new parties.	12/31/13	02/28/14
Disclosure of expert witnesses.	04/01/14	06/02/14
Fact discovery cut-off.	06/02/14	08/04/14
Expert reports due.	07/01/14	09/02/14
Expert rebuttal reports due.	08/15/14	10/15/14
Expert discovery cut-off.	09/15/14	11/17/14
Dispositive motions filed.	10/01/14	12/01/14
Oppositions to dispositive motions.	12/01/14	02/02/15
Dispositive motions replies.	01/12/15	03/12/15
Pretrial conference.	02/01/15	04/01/15
Trial.	06/01/15	08/03/15

The adjustments to the existing pre-trial schedule sought herein are appropriate. The proposed new schedule does not expand the deadlines in the existing schedule but, rather as the

Court suggested would be appropriate, rolls the existing schedule forward by two (2) months to compensate for the timing of the order approving the schedule.

This request is made without prejudice to any party's right to seek additional time at a future date based upon then-existing circumstances.

WHEREFORE premises considered, the moving parties respectfully request that this joint motion be granted. A proposed order is submitted herewith.

Dated: December 17, 2013

/s/ John M. Simpson

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	PROPOSED ORDER
Upon consideration of the C	Consent Motion to Adjust Pretrial Schedule it is, this
day of, hereby	
ORDERED that the motion	is GRANTED; and it is further
ORDERED that the Order of	dated August 8, 2013 (ECF No. 157) is hereby modified by
replacing, in its entirety, the sched	ule set forth at pages 1-2 of that Order with the following
modified schedule:	
February 28, 2014	Deadline for amendments to pleadings and/or joinder of new parties.
June 2, 2014	Disclosure of expert witnesses.

Fact discovery cut-off.

Expert rebuttal reports due.

Expert discovery cut-off.

Dispositive motions filed.

Oppositions to dispositive motions.

Expert reports due.

August 4, 2014

September 2, 2014

October 15, 2014

November 17, 2014

December 1, 2014

February 2, 2015

March 12, 2015

Dispositive motions replies.

April 1, 2015

Pretrial conference.

August 3, 2015

Trial.

John M. Facciola

United States

Magistrate

Judge