



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:

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

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

Respectfully submitted,

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March 12, 2015 Dispositive motions replies.

April 1, 2015 Pretrial conference.

August 3, 2015 Trial.

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John M. Facciola  
United States Magistrate Judge