

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FELD ENTERTAINMENT, INC.	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 07- 1532 (EGS)
	:	
AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY ANIMALS, <u>et al.</u>	:	
	:	
Defendants.	:	
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PLAINTIFF’S PROPOSED PRE-TRIAL DISCOVERY SCHEDULE

Pursuant to the Court’s Minute Orders of November 2 and 5, 2010, plaintiff Feld Entertainment, Inc. proposes the following pre-trial discovery schedule:

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|---------------------------|--|
| December 1, 2010. | Entry of appearance by all counsel for all parties. |
| December 3, 2010. | Deadline for defendants’ responses to First Amended Complaint. |
| December 10, 2010. | On or before this date, the parties shall conduct the conference required by Fed. R. Civ. P. 26(f)(1)-(2). |
| January 7, 2011. | Exchange of Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and LCivR 26.2(a). |
| January 14, 2011. | The parties shall submit a written report to the Court, outlining the proposed discovery plan pursuant to Fed. R. Civ. P. 26(f)(3). |
| January 14, 2011. | Commencement of written discovery (interrogatories, document production requests, inspection requests, admissions requests and requests to third parties). |

January __, 2011.	Conference with court regarding discovery plan submitted by the parties.
March 4, 2011	Deadline for plaintiff's opposition to defendants' motion(s) to dismiss.
April 1, 2011.	Deadline for defendants' replies in support of motion(s) to dismiss.
April 1, 2011.	Commencement of depositions.
September 1, 2011.	Deadline for all amendments to the pleadings.
February 3, 2012.	Exchange lists of all fact witnesses, including any witness that a party may or will call at trial.
April 30, 2012.	Disclosure of identity of testifying expert witnesses, with <i>curriculum vitae</i> and brief summary of areas of testimony.
May 31, 2012.	Deadline for service of all written discovery requests.
July 2, 2012.	Fact discovery closed.
August 31, 2012.	Disclosure of initial expert reports pursuant to Fed. R. Civ. P. 26(a)(2) and commencement of expert discovery.
October 17, 2012.	Disclosure of rebuttal expert reports.
December 31, 2012.	Expert discovery closed.
March 1, 2013.	Deadline for all dispositive motions.

Dates for additional events and conferences with the Court, and a trial date, shall be established at a later time by further order of the Court.

Dated: November 19, 2010

Respectfully submitted,

/s/

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