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May 30, 2013

Sent via email.

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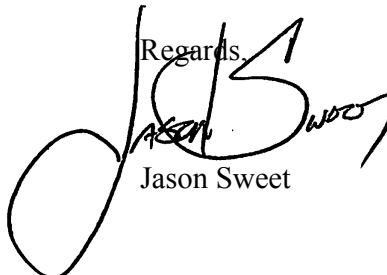
RE: *AF Holdings, LLC v. Elliot Olivas*, No. 3:12-cv-01401-JBA (D. Conn. Oct. 1, 2012)

Atty. Ruggiero:

This is to request a conference pursuant to Fed. R.Civ. P. 26(f) and Local Rule 16.1(b). As you recall, Defendant's initial request for disclosures was served upon the Plaintiff on April 3, 2013 via email, and on April 8, 2013 via certified mail.

We have prepared a proposed pretrial schedule pursuant to Local Rule 26(f), which is enclosed for your review and consideration. We are available on Tuesday, June 4, Wednesday, June 5, and on Thursday, June 6. Please let us know of a good date and time at your earliest convenience.

Thank you for your attention to this matter.

Regards,

Jason Sweet

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

_____)	
AF HOLDINGS, LLC,)	Civil Action No. 3:12-cv-01401-JBA
)	
Plaintiff/Counterdefendant,)	
)	
v.)	
)	
ELLIOT OLIVAS,)	
)	
Defendant/Counterplaintiff.)	
_____)	

JOINT STATEMENT OF PROPOSED PRETRIAL SCHEDULE

In compliance with Local Rule 26, counsel for the parties have conferred and now submit this proposed pretrial schedule in advance of the initial scheduling conference.

The parties' certifications under Local Rule 26 will be filed separately.

1. Initial Disclosures.

Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by June 15, 2013.

2. Amendments to Pleadings.

Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after June 15, 2013.

3. Fact Discovery – Interim Deadlines.

- a. Written discovery (requests for production of documents and interrogatories) shall be served no later than June 15, 2013.
- b. Requests for admissions shall be served no later than July 1, 2013.
- c. All depositions, other than expert depositions, must be completed by August 1, 2013.

4. Fact Discovery – Final Deadline

All discovery, other than expert discovery, must be completed by August 1, 2013.

5. Status Conference.

A status conference will be held on November 15, 2013.

6. Expert Discovery.

- a. The party having the burden of proof on an issue must designate, and disclose the information contemplated by Fed. R. Civ. P. 26(a)(2) for trial expert(s) on that issue by September 1, 2013.
- b. Opposing trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by October 1, 2013.
- c. All trial experts must be deposed by November 1, 2013.

7. Dispositive Motions.

- a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by December 1, 2013.
- b. Oppositions to dispositive motions must be filed within 21 days after service of the motion.
- c. Replies must be filed within 21 days after service of the opposition

8. Initial Pretrial Conference.

An initial pretrial conference will be held on a date to be determined by the Court at a later time.

Respectfully submitted,

Plaintiff,
AF Holdings LLC
By its attorneys,

Defendant,
Elliot Olivas
By his counsel,

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