

FAX COVER SHEET

TO Carl Hartmann

COMPANY

FAX NUMBER 12122023733

FROM Carl Hartmann

DATE 2013-07-10 21:05:02 GMT

RE Proposed Scheduling Order 2013-cv-101

COVER MESSAGE

Please see attached Proposed Order

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Hon. Michael Dunston
Superior Court of the Virgin Islands
Farrelly Justice Center
P.O. Box 70
St. Thomas, VI 00804

By Facsimile and US Mail
(340) 693-6462

RE: Proposed Scheduling Order - Stipulated
United Corp. v. Hamed, 2013-CV-101

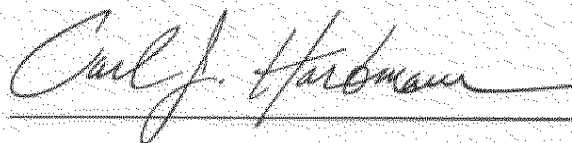
Dear Judge Dunston:

As directed, the parties have cooperated in the preparation of a *Proposed Scheduling Order*, a copy of which is attached.

With the permission of your chambers, I am sending a duplicate copy by facsimile.

We thank you for your attention in this matter.

Sincerely,



Carl J. Hartmann
cc: Nizar. A. DeWood, Esq.
Encl. (1)

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS/ST. JOHN**

UNITED CORPORATON,

Plaintiff,

v.

**WAHEED HAMED,
(a/k/a Willy, Willy Hamed)**

Defendant.

Case No.:2013-CV-101

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

PROPOSED STIPULATED SCHEDULING ORDER

COME NOW, the Parties by and through their counsel, and hereby stipulate and agree to the following Scheduling Order:

1. RULE 26 DISCLOSURES

The parties shall serve disclosures, pursuant to Fed. R. Civ. P 26(a)(i), by **September 1, 2013**.

2. FACTUAL DISCOVERY

All factual discovery, including written discovery and fact witness depositions, shall be completed by **April 1, 2014**.

2. PLAINTIFF'S EXPERT REPORTS

Plaintiff's expert disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2), if any, shall be submitted by **May 1, 2014**.

3. DEFENDANT'S EXPERT REPORTS

Defendant's expert disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2), if any, shall be submitted by **June 30, 2014**.

Stipulated Scheduling Order
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4. EXPERT DEPOSITIONS

Depositions of experts and other health care providers shall be completed by **July 30, 2014**.

5. MEDIATION

Mediation shall be completed not later than **September 1, 2014**.

6. MOTIONS

All dispositive motions shall be filed by **November 1, 2014**.

7. STATUS CONFERENCE.


A status conference will be held as scheduled by the Court

8. TRIAL DATE

A trial date will be scheduled by the Court.

Counsel for the parties have conferred. Counsel for the Plaintiff, Nizar A. DeWood, Esq., 2006 Eastern Suburb, Suite 101, Christiansted, VI 00820, has agreed to undersigned counsel's the filing of this document for both -- by email dated Mon 7/1/2013

Dated: July 10, 2013


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CERTIFICATE OF SERVICE

A true and accurate copy of this document was served by email on Plaintiff's Counsel as per the agreement of the parties, this 10th day of July, 2013.

