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Attorneys for Plaintiff
By: Michael R. Pruitt, State Bar No. 011792

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Jamie Ammann, a married woman filing
individually,

Plaintiff,

vs.

Midway Chevrolet Company, d/b/a
Midway Chevrolet an Arizona corporation;
John Thomas and Jane Doe Thomas,
husband and wife; John Bhatt and Jane
Doe Bhatt, husband and wife; John Cleaves
and Jane Doe Cleaves, husband and wife;
John and Jane Does I-X; Black
Corporations I-X; and White Partnerships
I-X,

Defendants.

Case No. CIV 06-2102-PHX-ROS

**MOTION TO EXTEND
CERTAIN DEADLINES**
(First Request)

Plaintiff Jamie Ammann, by and through her undersigned counsel, hereby requests that the deadlines for disclosing expert witness(es) and final written report(s), rebuttal/supplemental expert reports, completion of expert depositions, completing discovery, and filing dispositive motions be extended in this matter. Plaintiff requests that these deadlines be extended 30 days. A brief procedural history of this case follows.

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1 A Scheduling Conference was held in this matter on February 1, 2007. On February
2 27, 2007, the Court issued an Order setting the following deadlines: the deadline for Plaintiff
3 to disclose the identity of all persons who may be used at trial to present evidence under
4 Federal Rules of Evidence (F.R.Evid.) 701, 702, 703, 704, and 705 was set for June 11, 2007,
5 the deadline for Defendants to disclose the identity of all persons who may be used at trial
6 to present evidence under F.R.Evid. 701, 702, 703, 704, or 705 was set for July 30, 2007, the
7 deadline for completing discovery was set for October 1, 2007, the deadline for
8 supplementing discovery, including material changes in expert witness opinions and material
9 disclosures was set for October 15, 2007, the deadline for filing dispositive motions was set
10 for December 3, 2007, the deadline for filing a Joint Proposed Pretrial Order, all Motions in
11 Limine, a Joint Statement of the Case, Joint Jury Instructions, Verdict Form, and Stipulated
12 *Voir Dire* Questions was set for February 4, 2008, an Interim Rule 16 Status Hearing was
13 scheduled for October 19, 2007 at 8:30 a.m., and the deadline for filing a Joint Status Report
14 was set for October 12, 2007.

15 Plaintiff is in the process of obtaining expert report(s) on the issues of her present
16 value loss of income and emotional damages. Plaintiff believes that an additional thirty (30)
17 days is needed for her to obtain her expert reports. An extension of time of thirty (30) days
18 is also needed for the following deadlines: the deadline for Defendants to obtain their expert
19 reports, the deadline for completing discovery, the deadline for supplementing discovery, the
20 deadline for filing dispositive motions, and the deadline for filing a Joint Proposed Pretrial
21 Order, all Motions in Limine, a Joint Statement of the Case, Joint Jury Instructions, Verdict
22 Form, and Stipulated *Voir Dire* Questions.

23 Therefore, for the reasons set forth above, Plaintiff requests that she be given through
24 and including July 11, 2007 by which to disclose her expert witness(es) and final written
25 report(s), Defendants have through and including August 29, 2007 by which to disclose their
26 expert witness(es) and final written report(s), the Parties have through and including October

1 31, 2007 for completing discovery, the Parties have through and including November 14,
2 2007 by which to disclose any material changes in expert witness opinions and material
3 disclosures, the Parties have through and including January 2, 2008 by which to file
4 dispositive motions, and the Parties have through and including March 5, 2008 by which to
5 file a Joint Proposed Pretrial Order, all Motions in Limine, a Joint Statement of the Case,
6 Joint Jury Instructions, Verdict Form, and Stipulated *Voir Dire* Questions.

7 Defendants, through their counsel, have informed Plaintiff's counsel that Defendants
8 will not oppose this Motion.

9 **RESPECTFULLY SUBMITTED** this 11th day of June, 2007.

10 **JACKSON WHITE**

11

12 /s/ Michael R. Pruitt
13 By: Michael R. Pruitt, No. 011792
14 40 North Center Street, Suite 200
Mesa, Arizona 85201
Attorneys for Plaintiff

15 I hereby certify that I electronically transmitted the
16 attached document to the Clerk's Office using the
17 CM/ECF System for filing and transmittal of a
18 Notice of Electronic Filing to the following if
CM/ECF registrants, and mailed a copy of same
to any non-registrants this 11th day of June, 2007:

19 Tricia Schafer
20 Mariscal Weeks McIntyre & Friedlander PA
21 2901 North Central Avenue, Suite 200
22 Phoenix, Arizona 85012-2705
23 Attorneys for Defendants

24 Michael Brett Burns
25 Stephanie K. Osteen
26 Akin Gump Strauss Hauer & Feld LLP
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Attorneys for Defendants

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1 Copy of the foregoing hand-delivered this 12th day
of June, 2007, to:

2

The Honorable Roslyn O. Silver
3 United States District Court
Sandra Day O'Connor U.S. Courthouse, Suite 525
4 401 West Washington Street, SPC 50
Phoenix, Arizona 85003-2153

5

6 /s/ Debra Carpenter

F:\ABC\Ammann\District\Motion to Extend Certain Deadlines.wpd

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