



1 WHEREAS the parties have been holding off on the completion of certain discovery  
2 and the retention of experts in an effort to save resources in the event the matter can settle  
3 (and to increase the chance of settlement); and

4 WHEREAS the following changes in the dates previously set by the Court will not  
5 impact any date involving the Court, nor will they delay the trial of this matter in any way:

6 THE PARTIES HEREBY STIPULATE AND RESPECTFULLY REQUEST THAT  
7 THE COURT ORDER the following changes in the current pre-trial deadlines relating to  
8 the completion of discovery and the exchange of expert reports:

<i>Event:</i>	<i>Current Deadline:</i>	<i>Parties Request:</i>
Trial Date:	February 13, 2012	NO CHANGE
Pre-Trial Conf.:	January 27, 2012	NO CHANGE
Pre-Trial Disclosures	January 30, 2011	NO CHANGE
Expert Discovery Cut-off:	January 30, 2011	NO CHANGE
Last Day to serve (by hand) ROGS/RPDS /Deposition notices	November 4, 2011	December 14, 2011
Disclosure of Experts and Reports:	November 13, 2011	January 13, 2011
Fact Discovery cut-off:	December 6, 2011	January 13, 2011

18 Dated: November 3, 2011

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Attorneys for Plaintiff,  
SORT WELL, INC DBA AMNAV  
MARITIME SERVICES

21 By:           /s/ Jody T. McCormack            
22 Jody T. McCormack

23 Dated: November 3, 2011

BRODSKY MICKLOW  
BULL & WEISS LLP  
Attorneys for Plaintiff  
JEFF RUTHERFORD

25 By:           /s/ Edward M. Bull III            
26 Edward M. Bull III

27 **CERTIFICATE OF SIGNATURE**

28 I attest that the content of this document is acceptable to attorney, Edward M. Bull  
III, and that he authorized me to sign the document on his behalf.

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**[PROPOSED] Case Management Order**

The Joint Stipulation and Proposed Order is hereby adopted by the Court and the parties are ordered to comply with this Order.

Dated: 10/7/11

The Honorable S



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