

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 10-20718-CV-COOKE-BANDSTRA

ALBERT SEGAL and
MARIANNA CHAPAROVA,

Plaintiffs,

vs.

AMAZON.COM, INC.,

Defendant.

JOINT SCHEDULING REPORT

The *pro se* Plaintiffs, Albert Segal and Marianna Chaparova, and Defendant, Amazon.com, Inc., by and through its undersigned attorneys, pursuant to Federal Rules of Civil Procedure 26(f) and Local Rule 16.1(b), hereby submit their Joint Scheduling Report. The parties conferred on June 18, 2010 regarding each of the items identified in Local Rule 16.1 as follows:

Local Rule 16.1(a)

Case Management Track: The Parties recommend that this case be assigned a Standard Track.

Local Rule 16.1(b)

(a) **Likelihood of Settlement:** The Parties' positions on settlement are not sufficiently developed at this time. Thus, the likelihood of settlement is uncertain.

(b) **Likelihood of Appearance of Additional Parties:** At this time, the Parties do not anticipate the need to join any additional parties to this case.

(c) **Proposed Time Limits to:**

i. **Join Parties and Amend Pleadings:** The Parties propose that the deadline for joining parties and amending pleadings shall be **October 8, 2010**.

ii. **File Motions (other than Motions in Limine):** The Parties propose **January 7, 2011** as the deadline for filing pretrial motions (other than motions in limine).

iii. **Complete Discovery:** The Parties propose a fact discovery deadline of **January 3, 2011** and an expert discovery deadline of **February 18, 2011**.

(d) **Proposals for the formulation and simplification of the issues:** The Parties agree to discuss proposals for the formulation and simplification of the issues.

(e) **Necessity of Amendments to the Pleadings:** None at this time.

(f) **Possibility of obtaining admissions of facts and of documents:** The Parties propose to meet after the applicable discovery cut-off date and before the pre-trial conference to discuss stipulations regarding the authenticity of documents and the need for advance rulings from the Court on the admissibility of evidence.

(g) **Suggestions for the avoidance of unnecessary proof and cumulative evidence:** The Parties agree to cooperate in developing pretrial stipulations to avoid unnecessary proof and cumulative evidence.

(h) **Referring matters to a magistrate judge or master:** The Parties do not object to referring non-dispositive pretrial matters to the magistrate judge assigned to this case. An election form is attached to this Scheduling Report.

(i) **Preliminary estimate of time for trial:** Plaintiffs do not expect the trial to exceed ten (10) days. Counsel for Amazon believes the trial will not exceed three (3) days.

(j) **Dates for conferences before trial, a final pretrial conference, and trial:** The

Parties propose **June 10, 2011** as for a pre-trial conference, and **June 17, 2011** as the trial date.

(k) **Any other information helpful to the Court:**

i. **Rule 26 Initial Disclosures:** The Parties will serve their Initial Disclosures by **July 23, 2010**.

ii. The Parties have jointly completed Attachment A to the Court's Order Requiring Counsel to Meet and Confer and File a Joint Scheduling Report and Proposed Order [D.E. 10], which is attached hereto as Exhibit A.

Dated: June 23, 2010

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CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2010, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing system:

/s/ David B. Esau _____
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