

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIGUEL ANGEL CORBACHO DAUDINOT

Plaintiff,

CASE NO.: 1:13-cv-22589-KMW

v.

YASIEL PUIG VALDES a/k/a YASIEL PUIG and
MARITZA VALDES GONZALEZ.Defendants.

SCHEDULING CONFERENCE REPORT

COME NOW, counsel for the Plaintiff and the Defendants and file the following Scheduling Conference Report:

(A) **Likelihood of Settlement.** The parties will discuss settlement of this claim throughout litigation and will inform the Court if any settlement is reached.

(B) **Likelihood of Appearance in the Action of Additional Parties.** Plaintiffs contend that it is unlikely, but possible, that additional parties may arise as a result of reasonable discovery conducted. Defendants do not intend to add additional parties and believe that it is unlikely that additional parties shall be added to the case.

(C) **Proposed limits on the time.** The parties agreed on November 15, 2014 as the deadline to join other parties and to amend the pleadings. But due to an inherent disagreement about the rigors required during the discovery period and the time each party believes that they will need for discovery, the parties were unable to agree to time limits on (ii) the time to file and hear motions and (iii) the time to complete discovery. *Please see Exhibit A, the proposed joint scheduling order.*

(D) **Proposals for the Formulation and Simplification of Issues.** At this time, the parties do not have any specific proposals for the formulation and simplification of any issues. As the case progresses, the parties will continue to confer in good faith to discuss proposals for the formulation and simplification of issues in this case.

(E) **Necessity of Amendments to Pleadings.** An amendment to Plaintiffs' Complaint may be necessary depending on the outcome of Defendants' Motion to Dismiss [DE 11].

(F) **Admissions and Stipulations Which Will Avoid Unnecessary Proof.** The parties will work together to obtain admissions and stipulations that will avoid unnecessary proof at trial.

(G) **Suggestions for the Avoidance of Unnecessary Proof and of Cumulative Evidence.** The parties will work together to develop any suggestions that will avoid unnecessary proof and presentation of cumulative evidence at trial.

(H) **Referral of Matters to Magistrate Judge.** The parties consent to the court's sending discovery matters to the Magistrate judge, but do not consent to trial by the Magistrate Judge, nor to the disposition of dispositive pre-trial motions by a Magistrate Judge.

(I) **Preliminary Estimate of the Time Required for Trial.** The parties believe this matter will require 3-5 days of trial.

(J) **Pretrial Conference and Trial Dates.** The parties agree that the trial should be held on November 9, 2015 with final pretrial conference to take place on October 15, 2015.

(K) **Manual on Complex Litigation.** At this time the parties believe that the Manual on Complex Litigation and any other need for rule variations is unnecessary.

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