

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

MEANITH HUON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 11-cv-03054
)	
ABOVETHELAW.COM, DAVID LAT, ELIE MYSTAL,)	Judge Aspen
BREAKINGMEDIA.COM, JOHN LERNER, DAVID)	
MINKIN, BREAKING MEDIA, JOHN DOES 1 to 100,)	Magistrate Judge Gilbert
GAWKER MEDIA a/k/a GAWKER.COM,)	
JEZEBEL.COM, NICK DENTON, IRIN CARMON,)	
GABY DARBYSHIRE, JOHN DOES 101 to 200,)	
LAWYERGOSSIP.COM, JOHN DOE NO. 201,)	
NEWNATION.ORG a/k/a NEWNATION.TV a/k/a NEW)	
NATION NEWS, and JOHN DOE NOS. 401, 402, and)	
403,)	
)	
Defendants.		

INITIAL JOINT DISCOVERY PLAN

Pursuant to the Court’s local rules, the parties, by their respective counsels, hereby submit the following Initial Joint Discovery Plan:

PREFATORY NOTE

The Above The Law Defendants understand from the Court’s August 23 order extending their deadline to respond to the complaint and rescheduling the status conference to October 13, 2011, that no discovery plan is required at this time.

Plaintiff, Meanith Huon, submits this document pursuant to the Court’s prior order.

A. The attorneys of record for each party, including the attorney(s) expected to try the case.

1. For Defendants Abovethelaw.com, David Lat, Elie Mystal, Breakingmedia.com, John Lerner, David Minkin, and Breaking Media (“Above The Law Defendants”):

Steven P. Mandell (Lead Trial Counsel)
Steven L. Baron
Sharon R. Albrecht
Mandell Menkes LLC

2. For the Plaintiff, Meanith Huon:

Meanith Huon (Lead Trial Counsel)
(Mr. Huon is admitted to the Federal Trial Bar but is in the processing of looking for a trial attorney to try the case.)

B. The name of any party who or which has not been served, and any fact or circumstance related to non-service of process on such party.

There are several defendants who have not been served. Mr. Huon has sent waiver of summons to certain defendants. Mr. Huon has sent waiver of summons to defendants, Gawker Media a/k/a Gawker.com, Jezebel.comn Nick Denton, Irin Carmon, Gaby Darbyshire.

Mr. Huon has sent waiver of summons to defendant, Newnation.org a/k/a Newnation.tv a/k/a New Nation News, but these defendants have refused to accept mail from Mr. Huon.

Mr. Huon intends to move to initiate discovery to issue subpoenas to identify certain defendants and/or to move for service by alternative service on certain defendants, if applicable.

C. A brief description of any discovery that has been taken and of the discovery anticipated to be required, and suggested dates for discovery deadlines and cutoff. Parties are reminded of their discovery obligations under Fed. R. Civ. P. 26 and Local Rule 26.1.

No discovery has been conducted.

The Above The Law Defendants have filed a motion for an extension of time to respond to the Second Amended Complaint, to September 21, 2011. Mr. Huon does not oppose the motion.

Mr. Huon and counsel for The Above The Law Defendants have conducted a discovery conference via telephone.

The Above The Law Defendants understand from the Court's August 23 order extending their deadline to respond to the complaint and rescheduling the status conference to October 13, 2011, that no discovery plan is required at this time.

Mr. Huon seeks to initiate discovery at this time only as to the defendants who have not appeared in order to issue subpoenas to attempt to identify or locate the defendants who have not appeared. Mr. Huon will file the appropriate motion.

/s/Meanith Huon _____
Meanith Huon

Meanith Huon
The Huon Law Firm
PO Box 441
Chicago, Illinois 60690
1-312-405-2789
FAX No.: 312-268-7276
ARDC NO:6230996

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August, 2011, I caused to be served a true and correct copy of the foregoing **INITIAL JOINT DISCOVERY PLAN** by causing copies of same to be served electronically on all counsel of record who have appeared in this case.

/s/Meanith Huon _____
Meanith Huon
PO Box 441
Chicago, Illinois 60690
Phone: (312) 405-2789
E-mail: huon.meanith@gmail.com
IL ARDC. No.: 6230996