

Shartle, Bryan

From: Shartle, Bryan
Sent: Tuesday, December 09, 2008 9:43 AM
To: Wein, Andrew
Cc: Glenn.Farnet@keanmiller.com; Wilson, Donna; tbuck@bluewilliams.com; Israel, Dave; Shartle, Bryan C., Esq. (bshartle@sessions-law.biz)
Subject: Pinero v. Jackson Hewitt--Stipulation Regarding Discovery Issues
Importance: High

Andrew:

The parties agree and stipulate to the following to address the pending Motion to Stay:

1. Andrew and Bryan will call chambers today to notify the Court that the parties have reached an agreement regarding the discovery dispute. Jackson Hewitt will withdraw the Motion to Stay without prejudice;
2. No party will conduct any discovery until the Court rules on the pending Motions to Dismiss;
3. The non-party deposition of Mary Hall will be continued until some time after the Court rules on the pending Motions to Dismiss;
4. The parties will coordinate after the Court rules on the pending Motions to Dismiss to schedule all pending discovery demands;
5. Discovery responses will not be due until 30 days after the Court rules on the pending Motions to Dismiss; and
6. Any party may issue written discovery demands to the other party, but discovery responses will not be due until 30 days after the Court rules on the pending Motions to Dismiss.

Please call me when you have time to call the Court. Thanks.



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