

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTINE VARAD,)	
)	
Plaintiff,)	
)	C.A. No. 06 CA 11370 MLW
v.)	
)	
REED ELSEVIER INCORPORATED,)	
d/b/a/ Lexis Nexis Corporation,)	
Lexis Nexis Accurint,)	
)	
Defendant.)	

**DEFENDANT’S STATEMENT PURSUANT TO
COURT’S JANUARY 18, 2007 ORDER**

Pursuant to the Court’s Order on Parties’ Motions dated January 18, 2007, defendant Reed Elsevier Inc. (“Reed”), hereby submits this Statement. Counsel for Reed conferred with plaintiff Christine Varad (“Plaintiff”) regarding the contents of a joint statement, but the parties were unable to reach agreement as to the contents of same.

1. Status of Case.

To date, Reed has served its initial disclosures, responded to Plaintiff’s Request For Production of Documents and produced documents responsive to the requests. Reed deposed Plaintiff on April 18, 2007. Reed has also received documents pursuant to a third party subpoena.

2. Defendant’s Proposed Scheduling for the Remainder of the Case.

Activity	Date
Completion of Discovery:	Discovery closes on May 18, 2007. Reed does not believe an extension of the deadline is necessary.
Motions for Summary Judgment filed by:	June 22, 2007

Oppositions to Summary Judgment Motions:	Within 30 days after service of Summary Judgment Motion
Pre-trial Conference:	At Court's earliest convenience after Order on Motions for Summary Judgment
Motions in Limine:	At least two weeks before trial
Trial:	At Court's earliest convenience after pre-trial conference

3. Use of Alternative Dispute Resolution ("ADR") Programs.

No agreement has been reached with regard to the use of ADR Programs.

4. Consent to Trial Before the Magistrate Judge.

No agreement has been reached with regard to trial before the Magistrate Judge.

Respectfully submitted,

REED ELSEVIER INC.

By its attorneys,

/s/ Kristin M. Cataldo

T. Christopher Donnelly (BBO #129930)

Kristin M. Cataldo (BBO #654033)

Donnelly, Conroy & Gelhaar, LLP

One Beacon Street, 33rd Floor

Boston, Massachusetts 02108

(617) 720-2880

Dated: April 25, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2007, I caused a copy of the foregoing to be served on Plaintiff following by regular mail:

Christine M. Varad
P.O. Box 583
Milton, MA 02186

/s/ Kristin M. Cataldo
Kristin M. Cataldo