

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FILED  
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2007 APR 25 A 8:20  
Civil Docket No.: **06 CA 11370 MEW**

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Christine. Varad,  
Plaintiff,  
v.

Reed Elsevier Incorporated,  
d.b.a. *LexisNexis, LexisNexis Risk &  
Information Analytics Group, Inc.*,  
Defendant.

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**PLAINTIFF'S JOINT STATEMENT**

Plaintiff hereby certifies the she conferred with counsel for the Defendant, Reed Elsevier Inc., d.b.a. LexisNexis Risk & Information Analytics Group, Inc. by telephone on April 24, 2007 concerning a proposed drafting of a Joint Statement. No agreement concerning the contents of such a statement could be reached and both parties agreed to file separate statements. Reed requested that the separate statements not be entitled, "Joint Statement" in order to call attention to the fact that no joint statement could be reached.

Plaintiff Christine Varad, hereby responds to the Court's order pursuant to Order On the Parties Motions, dated January 18, 2007 by providing the following information as required by paragraph 3:

1. **Status of the case**

This case remains in the initial discovery phase.

2. **Scheduling for the remainder of case through trial**

a.) Discovery cannot be completed by May 18, 2007

- i. Plaintiff has received no discovery at all to date and a motion to compel production of documents was filed on April 21, 2007. As a result, Plaintiff requests that the discovery period be extended as necessary to allow for completion of discovery the phase for both parties.
- ii. Reed has refused to acknowledge or respond to the Amended Complaint and has refused to respond to Varad's discovery requests concerning defendant Reed Elsevier Incorporated, d.b.a. *LexisNexis, LexisNexis Risk & Information Analytics Group, Inc.*

3. The use of alternative dispute resolution ("ADR") programs

The parties have reached no agreement concerning use of ADR programs. Plaintiff agreed to engage in the use of an ADR program to attempt to resolve the case, and requested the use of Mediation, (L.R. 16.4 C(4)), following a completed discovery phase but prior to the conclusion of the period for filing motions for a summary judgment. Plaintiff requests that the period for submission of motions for a summary judgment be extended to allow for full completion of the discovery phase by both parties.

4. Consent to trial by Magistrate Judge

No agreement between the parties could be reached.

April 24, 2007

Respectfully submitted,

  
Christine Varad