

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETT

07-11673-MLW

**WILLIAM V AGUIAR
PLAINTIFF**

**VS. CIVIL ACTION NO.
07-11673-MLW**

FLOYD WEBB AND ALL

PLAN FOR DISCOVERY

1. Disclosure will be exchanged by per agreement 12/03/07
2.
 - A. 1. Discovery will be needed on the following subject. 2. Defendant's contentions regarding alleged infringements at issue. 3. Defendants alleged contentions of the copyright's at issue and Defendant's 4. And Plaintiffs license and copyright of said material. amages.
 - B. Disclosure or discovery of electronically stored information should be limited as follows. 1. No party shall be required to engage in forensic recovery of electronic documents and 2. No party shall be obligated to produce all prior draft of electronic documents.
 - C. We do not oppose using Protective Order. Exhibit A.
 - D. All discovery, including written and deposition discovery will be completed no later than. September 19, 2008.
 - E. The federal Rules of procedure and local rules apply to the limit the number of interrogatories, requests for admission, request for production of documents, and depositions by each party, as well the length of each deposition.

F. At this time we do for see the need for expert testimony.

3.

OTHER ITEMS

- A. Plaintiff should be allowed until February 4, 2008 to join additional parties and to amend pleadings
- B. Defendant Webb should be allowed to February 4, 2008 to join to additional parties and to amend pleadings.
- C. All potentially dispositive motion should be filed by November 21 2008.
- D. A final pretrial conference with the court should be held in January 30, 2009
- E. We expect this case should be ready for trial by July 17, 2009.

SETTLEMENT PROPOSALS

Plaintiff and Defendants should provide each other with written settlement proposals no later than 10 days before the scheduling conference per Rule 16.1[c]

CONCLUSION

We look forward to working cooperatively with you on these matters per Rule 26 [f]

WILLIAM V. AGUIAR III
PRO SE

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12/2/07