

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)		
JANE DOE,)		
SUZETTE LINDGREN,)		
ANDREW MOYER,)		
on behalf of themselves and all others)		
similarly situated, and)		
MASSACHUSETTS COALITION)		
FOR THE HOMELESS, and)		
CENTRAL MASSACHUSETTS)		
HOUSING ALLIANCE,)		
)		CIVIL ACTION NO.:
Plaintiffs,)		06-40133-FDS
)		
v.)		
)		
CITY OF WORCESTER,)		
WORCESTER PUBLIC LIBRARY, and)		
WORCESTER PUBLIC LIBRARY)		
BOARD OF DIRECTORS,)		
)		
Defendants.)		
_____)		

PARTIES' LOCAL RULE 16.1 JOINT STATEMENT

The parties hereby certify that they have conferred pursuant to the requirements of Local Rule 16.1 and Fed. R. Civ. P. 26(f), and as result of said conference submit the following joint statement as required by those rules.

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) shall be completed by December 1, 2006.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after March 30, 2007.
3. **Fact Discovery – Interim Deadlines.**
 - a. All requests for production of documents and interrogatories must be served by March 30, 2007.
 - b. All requests for admissions must be served by July 16, 2007.

- c. All depositions, other than expert depositions, must be completed by June 15, 2007.
4. **Fact Discovery – Final Deadlines.** All discovery, other than expert discovery, shall be completed by August 15, 2007.
5. **Status Conference.** A status conference regarding fact discovery shall be held on or about August 15, 2007 or other date as determined by the Court.
6. **Expert Discovery.**
 - a. Plaintiffs’ trial expert shall be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) shall be disclosed, by August 15, 2007.
 - b. Plaintiffs’ trial experts shall be deposed by September 14, 2007.
 - c. Defendants’ trial expert shall be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) shall be disclosed, by September 14, 2007.
 - d. Defendants’ trial experts shall be deposed by October 15, 2007.
7. **Dispositive Motions.**
 - a. Dispositive motions shall be filed by September 14, 2007.
 - b. Oppositions to dispositive motions shall be filed within thirty (30) days after service of the motion.
8. **Pretrial Conference.** A pretrial conference shall be held on or about December 14, 2007 or other date as determined by the Court.

Defendants City of Worcester, Worcester
Public Library, and Worcester Public Library
Board of Directors,
By its attorneys,

/s/ David M. Moore
David M. Moore, Esq.
Janet J. McGuiggan, Esq.
City Hall, Room 301
455 Main Street
Worcester, Massachusetts 01608
(508) 799-1161

Plaintiffs Jane Doe, Suzette Lindgren, Andrew
Moyer, Massachusetts Coalition for the
Homeless and Central Massachusetts Housing
Alliance,
By their attorneys,

/s/ Kate J. Fitzpatrick
Jonathan L. Mannina, Esq.
Kate J. Fitzpatrick, Esq.
Legal Assistance Corporation
of Central Massachusetts
405 Main Street, Fourth Floor
Worcester, Massachusetts 01608
(508) 752-3718

Date: October 20, 2006

Date: October 20, 2006

CERTIFICATE OF SERVICE

I, Kate J. Fitzpatrick, attorney for the Plaintiffs, hereby certify that I have on this twentieth day of October, 2006, mailed the within, postage prepaid, to David M. Moore, Esq., City Hall, Room 301, 455 Main Street, Worcester, Massachusetts, 01608 and John Reinstein, Esq., American Civil Liberties Union of Massachusetts, 211 Congress Street, Suite 300, Boston, Massachusetts, 02110.

/s/ Kate J. Fitzpatrick
Kate J. Fitzpatrick