

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

Case No. 04-CV-74932

-vs-

Hon. ANNA DIGGS TAYLOR

INDIANA PACERS, an assumed name a/k/a PACERS  
BASKETBALL CORPORATION, an Indiana corporation,  
JERMAINE O'NEAL and ANTHONY JOHNSON,

Mag. Judge Donald A. Scheer

Defendants.

---

L.S. CHARFOOS (P11799)  
JASON J. THOMPSON (P47184)  
Attorneys for Plaintiff  
5510 Woodward Avenue  
Detroit, Michigan 48202  
(313) 875-8080/FAX 8522

Potter, DeAgostino, Campbell & O'Dea  
STEVEN M. POTTER (P33344)  
Attorney for Indiana Pacers  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700/FAX 0051

LAWRENCE G. CAMPBELL (P11553)  
BRIAN M. AKKASHIAN (P55544)  
RICHARD M. APKARIAN, JR. (P66206)  
Attorneys for Jermaine O'Neal  
500 Woodward Avenue, Suite 4000  
Detroit, Michigan 48226  
(313) 223-3500

THOMAS W. CRANMER (P25252)  
MATTHEW F. LEITMAN (P48999)  
HIDEAKI SANO (P61877)  
Attorneys for Anthony Johnson  
150 W. Jefferson, Suite 2500  
Detroit, Michigan 48226  
(313) 496-7651

WILLIAM D. TEMKO  
JOSEPH YBARRA  
Co-Counsel for Jermaine O'Neal  
355 S. Grand Avenue, 35<sup>th</sup> Floor  
Los Angeles, California 90071  
(213) 683-9266

---

**DEFENDANT INDIANA PACERS' OBJECTIONS TO  
PROPOSED SCHEDULING ORDER**

NOW COMES Defendant, INDIANA PACERS, by and through their attorneys, POTTER, DeAGOSTINO, O'DEA & PATTERSON, and for its Objections to this Court's Proposed Scheduling Order Dated October 24, 2005, states as follows:

1. Defendant INDIANA PACERS objects to this Court's discovery cut-off date of March 27, 2006 as it does not provide sufficient time to complete discovery. Defendant proposes a discovery cut-off date of June 15, 2006.

2. Defendant INDIANA PACERS objects to this Court's proposed dispositive motion cut-off filing date of May 8, 2006 because Defendant is requesting discovery beyond that date. Defendant proposes a dispositive motion cut-off filing date of June 1, 2006.

3. Defendant has no objection to this Court's Final Pre-Trial date, Settlement Conference date and Trial date.

POTTER, DeAGOSTINO, O'DEA & PATTERSON

s/STEVEN M. POTTER (P33344)  
Attorney for Defendant Indiana Pacers  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700  
[spotter@potterlaw.com](mailto:spotter@potterlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2005, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: LAWRENCE S. CHARFOOS; HIDEAKI SANO; BRIAN M. AKKASHIAN; RICHARD M. APKARIAN; JASON J. THOMPSON and mailing said document to WILLIAM D. TEMKOW, 355 S. GRAND AVE., 25<sup>TH</sup> FLOOR, LOS ANGELES, CA 90071.

s/STEVEN M. POTTER (P33344)  
Attorney for Defendant Indiana Pacers  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700  
[spotter@potterlaw.com](mailto:spotter@potterlaw.com)