

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

S. VICTOR WHITMILL,)	
)	
Plaintiff,)	
)	Civil Action No. 4:11-cv-752
v.)	
)	
WARNER BROS. ENTERTAINMENT INC.,)	
)	
Defendant.)	

[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY ON AN EXPEDITED SCHEDULE

This matter is before the Court on Plaintiff S. Victor Whitmill’s Motion for Leave to Conduct Limited Discovery on an Expedited Schedule (the “Motion”). (Doc. # _) Having reviewed the discovery requests, considered the arguments, and good cause having been shown,

IT IS HEREBY ORDERED that Plaintiff’s Motion is **GRANTED**.

IT IS FURTHER ORDERED that Plaintiff may propound the Expedited Discovery Requests (the “Discovery Requests”) attached to his Motion before the time otherwise allowed under the Federal Rules of Civil Procedure without further service, and that the following schedule will apply:

1. Defendant Warner Bros. Entertainment, Inc. (“Warner Bros.”), shall serve its responses to the Discovery Requests by hand delivery, electronic mail, or facsimile transmission, no later than **5:00 p.m.**, _____, **May**, **2011**.

2. Any motions to compel based upon such properly served responses shall be filed no later than **9:00 a.m.**, _____, **May**, **2011**.

3. The Defendant shall make its representatives available for depositions pursuant to Federal Rule of Civil Procedure 30(b)(6), between _____, **May**, **2011**,

and _____, **May**, **2011**, inclusively, at such date, time, and location upon which the parties might agree.

4. Nothing in this Order prejudices Defendant's rights to seek discovery from Plaintiffs on an expedited basis, subject to the Parties' agreement upon an appropriate amount of time for Plaintiffs to respond to Defendants' requests.

This schedule may be modified by Court Order, only upon written motion. Failure to comply with any part of this Order may result in the imposition of sanctions.

UNITED STATES DISTRICT COURT JUDGE

Dated: _____

EXHIBIT B