

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

ANAKA HUNTER,)	
)	
Plaintiff,)	
)	
v.)	No. 4:12-cv-004 ERW
)	
BOARD OF TRUSTEES, SALEM PUBLIC)	
LIBRARY, et al.,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING PLAN

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court's Order of April 11, 2012 (Doc. # 28):

- I. Scheduling Plan:
 - 1. This case has been appropriately assigned to Track 2 (Standard).
 - 2. All motions for joinder of additional parties or amendment of the pleadings should be filed no later than July 6, 2012.
 - 3. Discovery shall proceed in the following manner:
 - (a) The parties shall make all disclosures required by Rule 26(a)(1), FED.R.CIV.P., no later than May 15, 2012.
 - (b) Discovery shall not be conducted in phases or limited to certain issues.
 - (c) Any party that plans to offer expert testimony shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than

August 31, 2012, and shall make expert witnesses expected to testify at trial available for depositions no later than September 14, 2012.

(2) Any rebuttal experts shall be disclosed and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than October 5, 2012, and be made available for depositions no later than October 19, 2012.

(c) The presumptive limit of twenty-five (25) interrogatories per party as set forth in Rule 33(a), Fed.R.Civ.P., shall apply.

The presumptive limit of ten (10) depositions per side as set forth in Rule 30(a)(2)(A), Fed.R.Civ.P., shall apply.

(d) Motions for physical or mental examinations of the parties will not be made.

(e) The parties shall complete all discovery in this case no later than November 16, 2012.

4. The parties believe that referral of this action to Alternative Dispute Resolution would be appropriate.

5. Any dispositive motion or, if necessary, motion to exclude testimony pursuant to *Daubert v. Merrell Dow Pharmaceuticals Inc.* or *Kuhmo Tire Co. Ltd v. Carmichael* must be filed no later than January 11, 2013.

II. Trial. The parties submit that this case will be ready for a bench trial on or after June 24, 2013. It is anticipated that the length of time to try the case to verdict is approximately three days.

Respectfully submitted,

/s/Matt Cologna

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CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available electronically to all electronic filing participants.

/s/ Grant R. Doty