

Matt Cologna

From: Matt Cologna
Sent: Friday, October 05, 2012 2:15 PM
To: 'Grant Doty'
Subject: RE: Sheduling order changes

Grant,

Got your message and the email. I'll be filing a motion shortly reflecting the agreed deadlines. Thanks,

Matt

Matt Cologna
mcologna@blmhpc.com

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From: Grant Doty [mailto:grant@aclu-em.org]
Sent: Friday, October 05, 2012 10:05 AM
To: Matt Cologna
Subject: RE: Sheduling order changes

Matt,

We would be amenable [and consent to] to extending your expert disclosures and report to November 7. The reason we would not agree to November 16 is that we would want to depose them before Thanksgiving. Additionally, this is



40+ days after our disclosure (September 28), well over the original amount of time you had for rebuttal experts (30+ days) before the initial extension.

Re the discovery deadline, we would consent to an extension to December 7 (not the 17th as you proposed) given our December schedules/dockets.

Grant

From: Matt Cologna [mailto:mcologna@blmhpc.com]
Sent: Thursday, October 04, 2012 3:12 PM
To: Grant Doty
Subject: Sheduling order changes

Grant,

I would like to push the deadline to disclose experts and reports to November 16, 2012, due to the difficulty I am having finding an expert with availability before November. I would also like to push the deadline for discovery to December 17 in case either of us determines that we need anything more after expert depositions. I don't anticipate doing much more discovery beyond what is attached. Please let me know if this is acceptable. Thanks,

Matt

Matt Cologna
mcologna@blmhpc.com

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