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UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

Ellington Credit Fund, Ltd,	:	
	:	
<i>Plaintiff,</i>	:	09-cv-00215 (SHS)
	:	ECF Case
- v. -	:	
	:	
Wells Fargo Bank N.A.,	:	JOINT DISCOVERY PLAN
	:	PURSUANT TO FED. R. CIV. P. 26(f)
	:	
<i>Defendant.</i>	:	
	:	

Pursuant to Rule 26(f) of the *Federal Rules of Civil Procedure*, the parties jointly submit this proposed discovery plan in advance of the initial status conference scheduled for March 27, 2009.

*Initial Disclosures:* The parties have agreed to serve Rule 26(a) disclosures on or before April 10. The parties propose, subject to the Court's approval, that initial disclosures in this case be limited to the disclosure of individuals likely to have discoverable information called for by Rule 26(a)(1)(A)(i). Any other disclosures required by Rule 26(a) will be handled through the discovery process.

*Discovery:* The parties have agreed that initial document requests will be served on or before April 24, 2009, and that document production will be complete by September 30, 2009. The parties anticipate that depositions will be complete by November 30, 2009.

*Expert Discovery:* The parties anticipate that expert discovery will be complete by December 30, 2009. ; The next status conf is set for 9/11/09 at 11AM.

*Changes to the Discovery Rules:* The parties do not believe it is necessary at this time to modify the limitations on discovery in the *Federal Rules of Civil Procedure*. If

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discovery reveals information that requires such modification, the parties will seek permission from the Court at an appropriate time.

*Court Orders:* The parties believe that certain limitations should be placed on the use of confidential discovery materials in this case. The parties intend to submit a jointly-proposed protective order for the Court's approval.

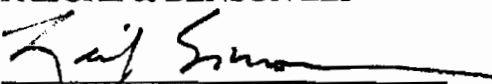
The parties also ask the Court to enter a scheduling order pursuant to Federal Rule of Civil Procedure 16(b).

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