

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VALENCIA M. MCCLATCHEY,)	
)	
Plaintiff,)	Civil Action No. 05-145J
)	
v.)	
)	
THE ASSOCIATED PRESS,)	JURY TRIAL DEMANDED
)	
Defendant.)	
_____)	

DISCOVERY PLAN

1. Rule 26(a) required disclosures shall be served on or before August 8, 2005.
2. Plaintiff's document requests shall be served on or before August 15, 2005. Plaintiff seeks the following general categories of documents: TBD. Defendant's responses shall be served on or before September 12, 2005. Responsive documents will be produced at TBD on or before September 12, 2005.
3. Defendant's document requests shall be served on or before August 15, 2005. Defendant's seeks the following general categories of documents: TBD. Plaintiff's responses shall be served on or before September 12, 2005. Responsive documents will be produced at TBD on or before September 12, 2005.
4. Plaintiff's interrogatories shall be served on or before August 31, 2005. Defendant seeks the following general categories of documents: TBD. Defendant's responses shall be served on or before September 28, 2005.
5. Defendant's interrogatories shall be served on or before August 31, 2005. Defendant seeks the following general categories of documents: TBD. Plaintiff's responses shall be served on or before September 28, 2005.
6. Any follow-up interrogatories and/or document requests shall be served on or before October 21, 2005. Responses shall be served on or before November 18, 2005 and responsive documents, if any, shall be produced on or before November 18, 2005.
7. Requests for admission shall be served on or before November 1, 2005. Responses shall be served on or before November 30, 2005.
8. Identification of Deponents:

<u>Name/Title of Deponent</u>	<u>Party Deposing</u>	<u>Topics</u>
TBD		

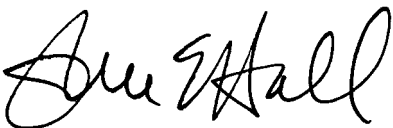
9. Identify unique discovery issues or problems, if any, including the topics contemplated in Fed.R.Civ.P. 26(f).

None at this time.

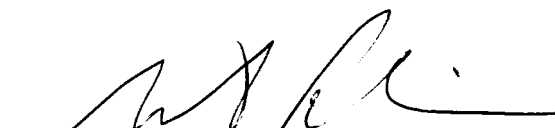
10. Identify actual or anticipated discovery disputes.

None at this time.

Signed:



John E. Hall



Robert Penchina
(Admitted Pro Hac Vice)

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the within Case Management Order and Discovery Plan was forwarded to all counsel of record, via first class mail, postage prepaid, this 25 day of July, 2005 as follows:

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