Pearse-Hocker v. Firelight Media, Inc. Doc. 17

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ANNE PEARSE-HOCKER,	)	
Plaintiff,	)	
v.	)	**Case No. 1:10-cv-458 (CMH/TRJ)**
FIRELIGHT MEDIA, INC.,	)	
Defendant.	)	

PLAINTIFF'S UNOPPOSED MOTION TO AMEND THE SCHEDULING ORDER AND EXTEND THE TIME TO SERVE RULE 26(a) EXPERT DISCLOSURES

Plaintiff, Anne Pearse-Hocker ("Pearse-Hocker"), by and through her undersigned counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 6(b)(1) to amend the scheduling order to grant Plaintiff a short, seven-day extension of time in which to serve Plaintiff's Rule 26(a) expert disclosure and to provide for a corresponding extension to Defendant.

As explained in the enclosed supporting Brief, settlement negotiations have continued since the Parties' mediation session held with the Court on September 14, 2010 and it appears that the Parties are close to achieving agreement on acceptable terms. As it appears that agreement may be reached shortly, Plaintiff would like to avoid incurring the additional fees for the preparation of a formal expert report by her retained expert in the event that the case is successfully settled in the coming days.

Counsel for Defendant advises that Defendant does not oppose the instant motion.

WHEREFORE, Plaintiff respectfully requests that her Unopposed Motion to Amend the Scheduling Order and Extend the Time to Serve Rule 26(a) Expert Disclosures be granted, that

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Plaintiff be granted an extension up to and including October 1, 2010, in which to serve her Rule 26(a) Expert Disclosure, and that Defendant be granted a corresponding extension up to and including October 29, 2010.

A proposed Order is attached.

Respectfully submitted,

THOMPSON HINE LLP

Dated: September 24, 2010

By: /s/ Eric Heyer

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Counsel for Plaintiff Anne Pearse-Hocker

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of September, 2010, I will cause the foregoing Plaintiff's Unopposed Motion to Amend the Scheduling Order and Extend the Time to Serve Rule 26(a) Expert Disclosures to be electronically filed and served via the Court's CM/ECF system on the following:

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/s/ Eric Heyer

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