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

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Case No. 1:10-cv-458 (CMH/TRJ)
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PLAINTIFF'S SECOND 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, the Parties have reached agreement as to the financial component of settlement, but Defendant has raised several collateral issues in memorializing the terms of the settlement which will require several business days to resolve. In an abundance of caution, Plaintiff requests an extension of the deadline to serve her Rule 26(a) expert disclosure, which, had a settlement not been reached, would have otherwise been due today.

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

WHEREFORE, Plaintiff respectfully requests that her Second Unopposed Motion to Amend the Scheduling Order and Extend the Time to Serve Rule 26(a) Expert Disclosures be granted extending Plaintiff's time to serve her Rule 26(a) expert disclosure through October 8, 2010, and that Defendant be granted a corresponding extension up to and including November 5, 2010.

A proposed Order is attached.

Respectfully submitted,

THOMPSON HINE LLP

Dated: October 1, 2010

By: /s/ Eric Heyer

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Counsel for Plaintiff Anne Pearse-Hocker

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of October, 2010, I will cause the foregoing Plaintiff's Second 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:

Elizabeth Koch, Esq.
John B. O'Keefe, Esq.
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Counsel for Defendant Firelight Media, Inc.

/s/ Eric Heyer

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