

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

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

**PLAINTIFF'S BRIEF IN SUPPORT OF HER 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, respectfully submits this brief in support of her motion to amend the scheduling order and extend the time to serve Rule 26(a) expert disclosures by seven days. In support of her motion, Plaintiff states as follows:

1. Pursuant to the Court's order dated September 28, 2010 [Dkt. 19], Plaintiff's Rule 26(a) expert disclosure is due today, October 1, 2010.
2. Federal Rule of Civil Procedure 6(b)(1) provides that the Court may, "for good cause," extend the time for Plaintiff to serve her expert report.
3. While Plaintiff has retained a valuation expert and received an informal opinion, in the last several days, the Parties reached agreement as to the monetary term of settlement.
4. However, Defendant has raised several collateral issues in the drafting of the settlement agreement which will require some time to resolve.

5. Additionally, counsel for Plaintiff understands that a family emergency arose during the night of September 30-October 1 that has thus far prevented lead counsel for Defendant from following up with counsel for Plaintiff.

6. Plaintiff requests an extension of time to serve her expert report in the event that the new issues remain unresolved.

7. The requested seven-day extension will not prejudice Defendant, as Plaintiff is simultaneously requesting that the Court grant Defendant an additional seven days, up to November 5, 2010, (from the current deadline of October 29, 2010), for Defendant to serve its expert disclosure. Counsel for Defendant advises that Defendant does not oppose the relief requested in this motion.

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 8th day of October, 2010, I will cause the foregoing Plaintiff's Brief in Support of her 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:

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*Counsel for Defendant Firelight Media, Inc.*

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/s/ Eric Heyer

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