

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Richmond Division

_____)	
BETTY J. OSTERGREN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:08cv362
)	
ROBERT F. MCDONNELL,)	
)	
Defendant.)	

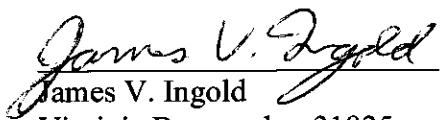
JOINT PROPOSED DISCOVERY PLAN

The parties, jointly by their respective counsel, hereby respectfully propose this plan to govern discovery in this litigation:

- (1) The parties agree to disclose all exhibits, except for rebuttal exhibits, and all witnesses (including name, address, telephone and matters on which they are expected to testify), except for expert and rebuttal witnesses, by November 18, 2008;
- (2) The parties agree to disclose all expert testimony and rebuttal witnesses/exhibits by December 9, 2008;
- (3) The parties agree to complete all depositions by January 7, 2009.

WE ASK FOR THIS:

_____/s/_____
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