

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

**Richmond Division**

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

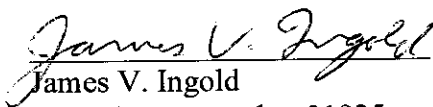
**CONSENT MOTION**

The parties, jointly by their respective counsel, hereby respectfully propose this adjusted 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 December 17, 2008;
- (2) The parties agree to disclose all expert testimony and rebuttal witnesses/exhibits by January 9, 2009;
- (3) The parties agree to complete all depositions by February 6, 2009.

**WE ASK FOR THIS:**

\_\_\_\_\_/s/\_\_\_\_\_  
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