

iJustice Law, P.C.  
Robert J. Siegel  
1325 Fourth Ave., Suite 940  
Seattle, WA 98101  
206-624-9392

THE HON. FRED VANSICKLE

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT  
OF WASHINGTON AT RICHLAND

James S. Gordon, Jr., Plaintiff,

vs.

Impulse Marketing Group, Inc.,

Defendant

Impulse Marketing Group, Inc., Third-

Party Plaintiff,

v.

Bonnie F. Gordon, Jamila Gordon,

James Gordon III, and Jonathan

Gordon, Third-Party Defendants

Case No.: CV-04-5125-FVS

PROPOSED DISCOVERY PLAN;  
STATUS REPORT CERTIFICATE

Pursuant to the Court's May 30, 2007 Notice Setting Telephonic Scheduling Conference, Plaintiff hereby submits this Proposed Discovery Plan and Status Report Certificate

### **Proposed Discovery Plan**

Extensive written discovery has been propounded by both parties. Motions to compel have been filed, and are pending with this Court now for over one year. The discovery disputes have been referred to a court-appointed Discovery Master, also appointed over one year ago, who has yet to issue dispositive rulings on the matters before him. Pursuant to this Court's orders, Plaintiff has filed an Amended First Amended Complaint, and a More Definite Statement. None of these significantly change the underlying claims and issues in the case, and the discovery propounded by Plaintiff remains outstanding.

Plaintiff proposes that the Discovery Master proceed to render rulings on the outstanding issues before him, and that the Court issue a new case schedule.

### **Status Certificate**

- a. **Issues Regarding Service of Process.** There are no issues regarding service of process. All parties have been served.
- b. **Issues Regarding Jurisdiction or Venue.** There are no issues regarding jurisdiction or venue.

- c. **Motions Anticipated.** All parties anticipate bringing motions for summary judgment.
- d. **Discovery Completed.** Discovery can be completed within 180 days of the issuance of dispositive rulings by the Discovery Master.
- e. **Special Procedures.** The case has been referred to a Discovery Master for resolution of ongoing discovery disputes.
- f. **Modifications to Standard Pretrial Procedures.** No modifications to the standard procedures are necessary.
- g. **Bifurcation.** There is no need to bifurcate this case.
- h. **Prospects for Settlement.** Settlement appears highly unlikely.
- i. **Other Matters.**

- 1. So as to minimize expense use of electronic data transfer, and email communication will be utilized where appropriate.

The parties do not consent to a full-time Magistrate Judge to conduct all proceedings.

**DATED** this 25th day of June, 2007.

**i.Justice Law, P.C.**

    /s/ Robert J. Siegel  
Robert J. Siegel  
WSBA# 17312  
Attorney for Plaintiff

### Certificate of Service

I, hereby, certify that on June 25, 2007, we filed this pleading with this Court. The Clerk of the Court will provide electronic notification system using the CM/ECF, which will send an electronic copy of this Notice to: Floyd E. Ivey; Sean Moynihan; Stacy Wolery. I further certify that I have served the foregoing to the following non-CM/ECF participants by other means: Bonnie Gordon; Jonathan Gordon; James S. Gordon, III; Jamila Gordon; Emily Abbey; and Hon. Harld D. Clarke, Jr.

/S/ Robert J. Siegel  
Robert J. Siegel, WSBA #17312  
Attorneys for Plaintiffs