

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

PAMELA K. MORAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Case No. 1:09-cv-00417-WCG
	)	
WALMART ASSOCIATES, INC.,	)	
	)	
Defendant.	)	

**RULE 26(f) JOINT DISCOVERY REPORT**

Pursuant to Fed. R. Civ. P. 26(f) and the April 28, 2009 letter from the Clerk of Court, Plaintiff and Defendant, by their attorneys, conferred by phone on May 27, 2009 and now submit the following report.

**I. Parties and Representatives**

**Plaintiff's Counsel**

Bree A. Madison  
E-mail: bree.madison@sscglaw.com  
**SILTON SEIFERT CARLSON, S.C.**  
331 East Washington Street  
Appleton, Wisconsin 54911  
Telephone: (920) 739-2366  
Facsimile: (920) 739-8893

**Defendant's Counsel**

Susan M. Zoeller (19959-49)  
E-mail: susan.zoeller@btlaw.com  
Katherine Stotler Bayt (23997-22)  
E-mail: katie.bayt@btlaw.com  
**BARNES & THORNBURG LLP**  
11 S. Meridian Street  
Indianapolis, Indiana 46204  
Telephone: (317) 236-1313  
Facsimile: (317) 231-7433

**II. Statement of the Case** Plaintiff alleges that Defendant's agents and employees made defamatory statements regarding Plaintiff's termination from employment causing an undetermined amount of damage to her. Defendant denies all allegations in Plaintiff's complaint and denies that Plaintiff is entitled to any relief.

**III. Settlement.** Plaintiff is in the process of providing Defendant with an initial settlement demand and the parties agree to engage in informal settlement discussion. Defendant would agree to consider formal alternative dispute resolution close to the dispositive motion deadline.

**IV. Discovery Plan**

a. Initial Disclosures. Plaintiff will serve initial disclosures on or before **July 19, 2009** and Defendant will serve initial disclosures on **August 19, 2009.**

b. Amendments to the Pleadings: All motions for leave to amend the pleadings and/or to join additional parties shall be filed on or before **July 19, 2009.**

c. Dispositive Motions. Dispositive motions are expected and shall be filed by **December 19, 2009.**

d. Expert Witness Disclosures. Plaintiff shall disclose the name, address, and vita of all expert witnesses, and shall serve the report required by Fed. R. Civ. P. 26(a)(2)(B) on or before **October 19, 2009.** If Defendant uses expert witness testimony at the summary judgment stage, Defendant shall disclose the name, address, and vita of all expert witnesses, and shall serve the report required by Fed. R. Civ. P. 26(a)(2)(B) on or before **November 19, 2009.** Otherwise Defendant shall make such disclosures by **January 19, 2010.**

- e. Discovery Cut-Off. Discovery shall be completed by **December 19, 2010**.
- f. Trial. The parties anticipate the trial in this matter will take 3-4 days.

Dated this 27<sup>th</sup> day of May, 2009.

Respectfully submitted,

*s/Katherine Stotler Bayt*

---

Susan M. Zoeller (19959-49)  
E-mail: susan.zoeller@btlaw.com  
Katherine Stotler Bayt (23997-22)  
E-mail: katie.bayt@btlaw.com  
**BARNES & THORNBURG LLP**  
11 S. Meridian Street  
Indianapolis, Indiana 46204  
Telephone: (317) 236-1313  
Facsimile: (317) 231-7433

*s/Bree A. Madison*

---

Bree A. Madison  
E-mail: bree.madison@sscglaw.com  
**SILTON SEIFERT CARLSON, S.C.**  
331 East Washington Street  
Appleton, Wisconsin 54911  
Telephone: (920) 739-2366  
Facsimile: (920) 739-8893