

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

LIBERTY MEDIA HOLDINGS, LLC
Plaintiff,
v.
RYAN FRAGA
Defendant.

CIVIL ACTION
CASE NO. 1:11-cv-11789
March 4, 2012
YOUNG, D.J. / as modified
So ordered as the case management scheduling order.
Discovery due Dec 1, 2012
Dispositive Motions due Jan 2, 2013

William A. Young
U.S. District Judge
JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

- 1. Counsel in the above-captioned action – Aaron Silverstein for the Plaintiff and Timothy Cornell for the Defendant – conferred by telephone on February 29, 2012 to agree upon a schedule for the above-captioned case, pursuant to Local Rule 16.1(D). Accordingly, the parties propose the following discovery plan:
(a) Initial disclosures to be completed by April 6, 2012
(b) Interrogatories and requests for production of documents to be completed by July 27, 2012.
(c) Full and complete expert reports to be exchanged or before the close of business on October 31, 2012.
(d) All discovery, including depositions, must be completed on or before the close of business on December 7, 2012.
(e) Orders regarding claims of privilege or of protection as trial-preparation material asserted after production shall be asserted no later than January 11, 2013.
(f) Counsel shall report for a further conference, on a date to be set by the Court after January 11, 2013.

(g) All supplementations under Rule 26(e) will be completed or before February 8, 2013.

(h) The Court may set a trial date at this conference. Estimated trial length is three days.

Other Items

(i) Final date for the parties to amend pleadings or to join parties: December 14, 2012.

(j) Final date to file dispositive motions: ^{Jan 2} ~~February 28~~, 2013.

(k) Prospects for settlement: Parties have discussed this as an initial matter and the prospects are not promising. The parties will not consider mediation.

(l) Final date for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition and exhibit lists: March 16, 2013.

(m) Final date to file objections under Rule 26(a)(3): April 9, 2013.

(n) Suggested trial date: Any date after April 9, 2013.

Respectfully submitted,

/s/ Aaron Silverstein

Aaron Silverstein
Attorney for the Plaintiff
(BBO #660716)
Saunders & Silverstein LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913
P: 978-463-9100
E: asilverstein@massiplaw.com

Respectfully submitted,

/s/ Timothy Cornell

Timothy Cornell
Attorney for the Defendant
B.B.O. No. 654412
Perry, Krumsiek & Jack, LLP
101 Arch Street, 19th Floor
Boston, MA 0211
tcornell@pkjlaw.com
(617) 720-4300

Dated: March 5, 2012

CERTIFICATE OF SERVICE

I hereby certify that on the above referenced date, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served via first-class mail to those indicated as non-registered participants.

/s/ Aaron Silverstein
Aaron Silverstein