

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Don ADDINGTON; John BOSTIC; Mark
BURMAN; Afshin IRANPOUR; Roger
VELEZ; and Steve WARGOCKI,

Plaintiffs,

vs.

US AIRLINE PILOTS ASSOCIATION,
US AIRWAYS, INC.,

Defendants,

Case No. 2:08-cv-1633-PHX-NVW
(Consolidated)

**PARITES' JOINT SUBMISSION FOR
THE SCHEDULE OF DISCOVERY
FOR THE DAMAGES TRIAL**

Don ADDINGTON; John BOSTIC; Mark
BURMAN; Afshin IRANPOUR; Roger
VELEZ; and Steve WARGOCKI,

Plaintiffs,

vs.

Steven H. BRADFORD, Paul J. DIORIO,
Robert A. FREAR, Mark. W. KING,
Douglas L. MOWERY, and John A.
STEPHAN,

Defendants.

Case No. 2:08-cv-1728-PHX-NVW

Pursuant to the Court's order (Doc. # 473), the parties have conferred and, except
in regard to expert disclosure and discovery agree on a proposed schedule as set out
below.

1 **The Parties jointly propose:**

- 2 1. The parties may serve document requests and interrogatories by June 3.
3 Responses to such document requests and interrogatories shall be served by July 1.
4 2. The parties shall supplement their Rule 26 disclosures by June 15 (as to
5 information the party is then aware, other than pertaining to experts).
6 3. Depositions of fact witnesses shall be completed not later than July 17.
7 4. Depositions of expert witnesses shall be completed not later than August 3.
8 5. All discovery will be completed by August 3.

9 **In regard to expert disclosure and discovery, Defendant proposes:**

- 10 6. Plaintiffs shall disclose the identity and qualifications of any expert witness not
11 later than July 1; reports are to be provided to Defendant by July 15.
12 7. Defendant shall disclose the identity and qualifications of any expert witness not
13 later than July 15; reports are to be provided to Plaintiffs by July 30.

14 **In regard to expert disclosure and discovery, Plaintiffs propose:**

- 15 8. Both Parties shall supplement their Rule 26 disclosures to address witnesses,
16 exhibits, documents, and potential areas of expert testimony by June 15.
17 9. Both Parties shall simultaneously disclose the identity of, qualifications of, and
18 report by, any expert witness not later than July 1.
19 10. Both Parties shall disclose the identity of, qualifications of, and report by, any
20 rebuttal expert witness not later than July 15.

21 Respectfully Submitted.

1 Dated this 26th day of May, 2009

2 SEHAM, SEHAM, MELTZ &
3 PETERSON, LLP

POLSINELLI SHUGHART PC

4 By: /s/ Nicholas P. Granath

By: /s/ Andrew S. Jacob

5 Nicholas P. Granath
445 Hamilton Avenue,
Suite 1204
White Plains, NY 10601

Andrew S. Jacob
Security Title Plaza
3636 N. Central Ave., Suite 1200
Phoenix, AZ 85012

6
7 CERTIFICATE OF SERVICE

8 I hereby certify that on **May 26**, 2009, I electronically transmitted the foregoing
9 document to the U.S. District Court Clerk's Office by using the CM/ECF System for
10 filing and transmittal of a Notice of Electronic Filing.

11
12
13
14
15
16
17
18
19
20
21
22
s/
Andrew S. Jacob