

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

7-ELEVEN, INC.,

Plaintiff,

v.

KARAMJEET SODHI, MAJINDER  
SINGH, KARAMJIT SINGH and  
DOES 1 through 50, inclusive,

Defendants.

CIVIL NO.: 3:13-cv-03715-MAS-DEA

RECEIVED

JAN 27 2014

AT 8:30 <sup>M</sup>  
WILLIAM T. WALSH CLERK

PROPOSED CASE MANAGEMENT ORDER

The parties hereby jointly submit the following proposed case management order, pursuant to the Court's January 8, 2014

Text Order:

1. The parties shall serve FED. R. Civ. P. 26(a) disclosures on or before **February 10, 2014**.

2. Additional written discovery requests shall be served by **March 3, 2014**. Any responses, answers and objections to initial written discovery requests shall be served by **April 30, 2014**.

3. By **February 17, 2014**, the parties shall serve the Court with an agreed upon Discovery Confidentiality Order that complies with L. Civ. R. 5.3 or a copy of the latest version of the Order with a list of the issues in dispute. All forms of Order must be accompanied by an affidavit or attorney certification that complies with Rule 5.3(b)(2).

4. The time within which to seek amendments to the pleadings or to add new parties will expire on **April 30, 2014**. Except as otherwise permitted in the Federal and Local Rules of Civil Procedure, leave of court is necessary to file an amended pleading.

5. Pretrial factual discovery is hereby extended to **June 17, 2014**.

6. All expert reports and expert disclosures pursuant to FED. R. Civ. P. 26(a)(2) shall be served no later than **July 1, 2014**. All rebuttal expert reports and expert disclosures pursuant to FED. R. Civ. P. 26(a)(2) shall be served no later than **August 8, 2014**. Each such report should be accompanied by the curriculum vitae of the proposed expert witness. Depositions of proposed expert witnesses shall be concluded by **September 5, 2015**.

7. **Dispositive Motions**. Dispositive motions shall be filed with the Clerk of the Court no later than **October 3, 2014** in accordance with the applicable Federal and Local Rules of Civil Procedure.

8. By **September 12, 2014**, the parties shall send the Court a letter identifying all discovery disputes. No issue will be addressed unless the letter is accompanied by an Affidavit that complies with L. Civ. R. 37.1(b)(1). All outstanding discovery issues not raised shall be deemed waived. Responses shall be served by **September 26, 2014**.

9. The Court will conduct an in-person status conference on April 14, 2014 at 11:00 a.m.

10. Any application for an extension of time beyond the deadlines set herein shall be made in writing to the undersigned and served upon all counsel prior to expiration of the period sought to be extended, and shall disclose in the application all such extensions previously obtained, the precise reason necessitating the application showing good cause under FED. R. Civ. P. 16(b), and whether adversary counsel agree with the application. The schedule set herein will not be extended unless good cause is shown.

**THE FAILURE OF A PARTY OR ATTORNEY TO OBEY THIS ORDER MAY RESULT IN IMPOSITION OF SANCTIONS UNDER FED. R. CIV. P. 16(f).**

Dated: 27<sup>th</sup> day of January, 2014

Mr. Arpert  
DOUGLAS E. ARPERT  
United States Magistrate Judge