

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FREDERICK M. CARGIAN,

Plaintiff,

-against-

BREITLING USA, INC.,

Defendant.

ECF Case

No. 15-cv-1084 (GBD)

APR 27 2015

PROPOSED RULE 26(F) DISCOVERY PLAN

After conferring pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Plaintiff and Defendant hereby submit the following discovery plan in the above-captioned action:

1. The parties are to serve initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure by April 17, 2015.
2. The parties may amend the pleadings and/or add new parties without Court approval at any time prior to August 7, 2015.
3. Discovery is to be completed by October 30, 2015.
4. Any party that wishes to make a dispositive motion shall file such motion no later than November 24, 2015. Responses to any such motion shall be filed no later than December 21, 2015 and replies shall be filed no later than January 15, 2016.
5. A final pretrial conference will be held on a date within four (4) weeks of the decision on any dispositive motion.
6. The Joint Pretrial Order shall be filed within thirty (30) days after the final pretrial conference.
7. All motion and applications shall be governed by the Court's Individual Rules of Practice.

8. The next pretrial conference shall be held on August 4, 2015 at 9:30 am.

Dated: New York, New York
April 9, 2015

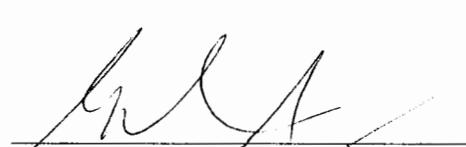
Dated: New York, New York
April 9, 2015

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Attorneys for Plaintiff

Attorneys for Defendants

SO ORDERED.

Dated: New York, New York
APR 27 2015, 2015



United States District Judge