

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
AT LEXINGTON
CASE NO.: 5:18-cv-00351-KKC

NICHOLAS CHARLES BREINER

PLAINTIFF

v.

PROPOSED AGREED SCHEDULING ORDER
Electronically Filed

BOARD OF EDUCATION OF MONTGOMERY COUNTY

DEFENDANT

* * * * *

Come the Plaintiff, Nicholas Charles Breiner, and the Defendant, Montgomery County Board of Education, by and through counsel, and jointly submit the following proposed Scheduling Order to comply with the Court's November 30, 2020 Order for the parties to meet and report. The parties indicate that they had a telephonic conference to discuss this matter on December 11, 2020. As a result of that conversation the parties jointly submit the following Scheduling Order:

1. That all fact discovery by both parties shall be completed by May 30, 2021.
2. That the Plaintiff shall designate all expert witnesses and make proper Rule 26.02 Disclosure along with any expert reports by July 30, 2021.
3. That the Defendant shall designate all expert witnesses and make proper Rule 26.02 Disclosure along with any expert reports by September 30, 2021.
4. That the Plaintiff shall make any rebuttal expert witness disclosure pursuant to Civil Rule 26.02 by October 30, 2021.
5. All parties shall have through June 30, 2021 to amend pleadings to join other parties.

6. The parties believe this matter will be ready for Pre-Trial Conference by December 30, 2021.

7. The parties shall file dispositive motions or motions in limine by no later than 30 days before any pre-trial conference.

8. The parties shall exchange mutual Witness Lists and Exhibit Lists within 30 days of the Pre-Trial Conference.

9. The parties believe that this matter may be suitable for alternative dispute resolution such as a mediation after the conclusion of fact discovery and expert witness disclosures.

10. The parties believe that this matter will be ripe for Trial by February 28, 2022 and the Trial will last for 5 days.

Entered this 12th day of January, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has this 12th day of January, 2021, been electronically mailed to the following:

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