



development project, and parallel court proceedings. The parties are working as diligently as possible to reach an expeditious resolution of this matter.

3. This is the parties' first request for an extension of the pretrial deadlines set by the Court.

4. The parties are unanimously joined in this request.

5. The parties' requested extension would result in the following revised pretrial deadlines:

**Amendments to Pleadings:** July 15, 2014.

**Fact Discovery:** August 15, 2014.

**Expert Discovery as to Liability:**

Disclosure of experts and opening reports: May 14, 2014.

Disclosure of responsive experts and rebuttal reports: June 16, 2014.

Expert depositions: August 15, 2014.

**Dispositive Motions:**

Motions for summary judgment: September 30, 2014.

Opposition briefs: October 30, 2014.

Reply briefs: November 13, 2014.

6. A status conference is currently scheduled in this matter on May 29, 2014 at 3:00. The present motion does not include a request for adjournment of this conference.

WHEREFORE, the parties jointly request a three-month extension of all pretrial deadlines in the July 15, 2013 Scheduling Order.

DATED: February 5, 2014

Respectfully Submitted,

**BINGHAM McCUTCHEM**

/s/ Siobhan E. Mee

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Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 5, 2014.

/s/ Deana K. El-Mallawany  
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