

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

UNITED CORPORATION,

Plaintiff,

v.

**WALEED HAMED,
(a/k/a Wally Hamed),**

Defendant.

Case No. 2013-CV-0003

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

RULE 26 JOINT PROPOSED SCHEDULING PLAN

Come now the parties, by counsel, and hereby propose the following scheduling plan:

DISCOVERY PLAN

- a. The parties shall serve Rule 26 self disclosures, purs to Fed. R. Civ. P. 26(a)(1), by **October 15, 2013**.
- b. The parties will conduct fact discovery with written discovery to be completed by **January 31, 2014**, and depositions to be completed by **May 31, 2014**. Any and all discovery demands previously served on either party shall be re-served following court approval of this discovery scheduling plan.
- c. Each party will file expert disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) on any issue in which they have the affirmative burden of proof by **June 30, 2014**. Responsive Expert Reports will be filed by **August 30, 2014**.
- d. The parties agree that the presumptive limits of ten (10) depositions per side and twenty five (25) interrogatories per party will apply.



g. There are no other matters of discovery pertinent at this time.

3. **MEDIATION**

Mediation shall be completed no later than **October 31, 2014**.

4. **MOTIONS**

All dispositive motions shall be filed by **December 31, 2014**.

5. **TRIAL DATE**

The earliest date by which this case should be reasonably be expected to be ready for trial shall be **March, 2015**.

6. **LENGTH OF TRIAL**

The estimated length of time expected to try the case to verdict is three (3) days.

7. **OTHER MATTERS**

None anticipated at this time.

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September 27, 2013

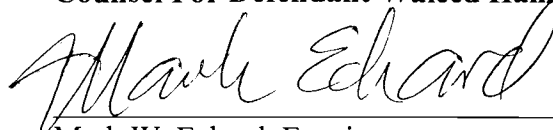
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Dated: September 27, 2013

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