

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

**UNITED CORPORATION,**  
Plaintiff,

v.

**WADDA CHARRIEZ,**  
Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**WADDA CHARRIEZ,**

Counter-Claimant,

v.

**UNITED CORPORATION,**  
Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**WADDA CHARRIEZ,**

Third-Party Plaintiff,

v.

**FATHI YUSUF,**  
Third-Party-Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**JOINT DISCOVERY AND SCHEDULING PLAN**

The Parties to the above-captioned civil action, in accordance with Virgin Islands Rules of Civil Procedure 16 and 26, agree and stipulation to the following discovery and scheduling plan for incorporation into the Case Management Order, dated:

1. All initial disclosures pursuant to V.I. R.Civ.P. 26(a) shall be served on all parties not later than **February 28, 2018**.

2. All written interrogatories, requests for production of documents, and requests for admissions shall be propounded not later than **April 2, 2018**.
3. No party shall propound more than 25 interrogatories, 25 requests for production of documents, and 25 requests for admissions, including all discrete subparts thereof, unless otherwise stipulated by the parties or ordered by the court.
4. All motions to amend the pleadings to add claims, defenses, and/or parties shall be filed and served no later than **April 16, 2018**. All fact witness deposition, including depositions of nonparties, taken for purposes of discovery and/or to preserve testimony for trial shall be completed by **August 1, 2018**.
5. No party shall take more than ten (10) fact and expert witness depositions, no single deposition shall exceed more than seven (7) hours in durations, and any single deposition shall be completed on the same day on which it is commenced, unless otherwise stipulated by the parties or ordered by the court.
6. All motions to compel, for discovery, sanctions, or for protective orders with respect to all initial disclosures and fact discovery, shall be filed and served no later than **May 1, 2018**.
7. The parties' first mediation session shall be commenced and completed not later than **July 1, 2018**.
8. All Parties shall serve notices identifying all of their expert witnesses, and said expert witnesses' curriculum vitae and written reports on any issue in which they have the burden of proof, not later than **April 30, 2018**.
9. All Parties shall serve notices identifying all of their rebuttal/expert witnesses, and said expert witnesses' curriculum vitae and written reports, not later than **September 30, 2018**.


10. All expert witness deposition, for purposes of discovery and to preserve testimony for trial, shall be completed not later than **October 31, 2018**.
11. All motions to compel, for sanctions, or for protective orders with respect to expert discovery, shall be filed and served not later than **November 15, 2018**.
12. All dispositive motions, except for motions challenging subject matter jurisdiction which may be filed at any time, and *Daubert/Kuhmo* motions shall be filed and served not later than **November 15, 2018**.
13. All motions in limine and V.I. Rule of Evidence 104 motions shall be filed and served not later than **December 14, 2018**.
14. This Joint Discovery and Scheduling Plan may not be amended, except as ordered by the court for good cause shown.

Respectfully Submitted,

**DUDLEY, TOPPER and FEUERZEIG, LLP**

Dated: February 7<sup>th</sup>, 2018

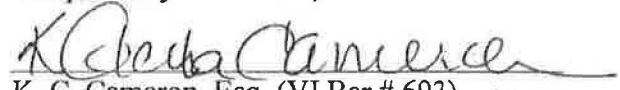
By:

  
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*Attorneys for United Corporation and Fathi Yusuf*

Respectfully Submitted,

Dated: February 7<sup>th</sup>, 2018

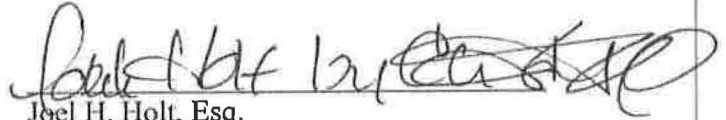
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*Attorneys for Third-Party Defendant, Fathi Yusuf*

Respectfully Submitted,

Dated: February 7<sup>th</sup>, 2018

By:



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The foregoing Joint Discovery and Scheduling Plan is APPROVED, and made a part of the Case Management Order dated \_\_\_\_\_.

Dated: \_\_\_\_\_, 20\_\_

\_\_\_\_\_  
Hon. Robert A. Malloy  
Judge of the Superior Court  
of the Virgin Islands

ATTEST:

Estrella George  
Acting Clerk of the Court

By: \_\_\_\_\_  
Court Clerk Supervisor \_\_/\_\_/\_\_