

**United States District Court  
Eastern District of Virginia  
Alexandria Division**

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**The PUBLIC INTEREST LEGAL FOUNDATION**

*Plaintiff,*

v.

**SUSAN REED, in her official capacity as General  
Registrar for the City of Manassas**

*Defendant.*

No. 3:16-CV-1375

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**JOINT DISCOVERY PLAN**

The parties hereby propose the following joint discovery plan pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Court's Scheduling Order entered on November 29, 2016:

1. The Initial Pretrial Conference is scheduled for December 21, 2016 at 11 a.m. before Magistrate Judge Michael S. Nachmanoff.
2. The parties held their Rule 26(f) discovery conference on December 13, 2016.
3. The parties shall exchange initial disclosures required by Rule 26(a)(1) by January 9, 2017;
4. The parties shall file motions for the joinder of new parties or the amendment of pleadings no later than January 9, 2017.
5. All written discovery, including interrogatories, requests for production of documents and requests for admission, shall be served no later than March 10, 2017.
6. With the exception of discovery related to expert witnesses, all discovery shall be completed by April 14, 2017.
7. The parties will disclose the information required under Rule 26(a)(2) on the following schedule: The expert disclosures required by Rule 26(a)(2) shall be made first by the plaintiff not later than February 21, 2017. The defendant's Rule 26(a)(2) expert disclosures shall

be made by March 23, 2017. If defendant makes expert disclosures, plaintiff shall disclose any rebuttal experts by April 7, 2017.

8. The parties expect that discovery in this case will involve certain electronic communications and records. Counsel have mutually agreed that the producing party may produce hard copies or .pdfs, with the receiving party having the right to request production of any specific document in a different format if desired.

9. The parties agree that any privilege logs produced in this matter shall be served within fourteen (14) days after the production date. In addition, attorney client communications need not be listed on privilege logs, unless there is a production of a redacted document and the producing party is noting why there is a redaction of a portion.

10. The parties have not agreed on the exercise of jurisdiction by a magistrate judge.

11. The parties agree to continue to discuss possibilities for settling or resolving this case. At this time, no settlement has been reached.

12. The Final Pretrial Conference will be held on April 20, 2017 at 10 a.m.

Dated: December 14, 2016

Respectfully submitted,

SUSAN REED, in her official capacity as General  
Registrar for the City of Manassas

/s/

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PUBLIC INTEREST LEGAL FOUNDATION

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*\*Pro Hac Vice application to be filed*