

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
ADRIAN SCHOOLCRAFT,

10CV6005(RWS)

Plaintiff,

Rule 26(f)(3)

-against-

Amended Discovery Plan

THE CITY OF NEW YORK, et al.,

Defendants.
-----x

The parties submit the following Amended Discovery Plan, pursuant to Federal Rules of Civil Procedure Rule 26(f)(3).

1. The continued deposition of the plaintiff by Mauriello/City and the medical defendants will be held on: August 26, 2013 and August 27, 2013.

2. The depositions of the defendants shall commence with the following depositions to be scheduled as follows.

<u>Witness</u>	<u>Date of deposition</u>
Deputy Chief Michael Marino:	August 29, 2013
Deputy Inspector Steven Mauriello:	September 10, 2013
Captain Theodore Lauterborn:	TBA between September 30 and October 3
Catherine Lamstein Psy.D:	To be arranged.
Lieutenant Timothy Caughey:	TBA between September 30 and October 3
Dr. Isak Isakov:	September 27, 2013
Dr. Aldana-Bernier:	September 20, 2013
Jamaica Hospital Medical Center:	Notice to be served by plaintiff for 30(b)(6) Depositions

S. A. Sanderik
Shu TUSOJ
8.17.13

The plaintiff states that he intends to conduct other depositions in this action and that those depositions shall be scheduled at later dates in October and November of 2013, within the times provided in this Discovery Plan.

3. The City of New York will serve a subpoena on Larry Schoolcraft for a deposition on October 8, 2013.
4. Fact discovery shall be completed by November 15, 2013.
5. Any motions for summary judgment shall be filed by November 18, 2013.
6. Expert discovery shall be completed by December 31, 2013. Any party seeking to offer expert testimony in his, her or its direct case shall provide the disclosures required by Rule 26(a)(2)(C) by November 29, 2013.
7. The action shall be set for trial on January 13, 2013 or the next available date consistent with the Court's calendar.
8. All dates in this discovery plan are subject to modification, and the inclusion of any specific discovery or any specific subject matter of discovery is not intended to operate as a limitation on any party's right to employ any discovery device.
9. This document may be executed in counterparts, and signatures transmitted by facsimile or other electronic means shall have the same force and effect as if signed in

the original.

Dated: New York, New York
July 31, 2013

Nathaniel B. Smith, Esq.
111 Broadway - Suite 1305
New York, New York
10006
212-227-7062 (tel)
natbsmith@gmail.com

Suzanna Publicker Mettham
(SP1005) Assistant Corporation
Counsel MICHAEL A. CARDOZO,
Corporation Counsel of the City of New
York
Attorney for City Defendants
Special Federal Litigation Division
New York City Law Department
(212) 788-1103
spublick@law.nyc.gov

Walter A. Kretz, Jr. (WK-4645)
Scoppetta Seiff Kretz &
Abercrombie Attorneys for
Defendant
Deputy Inspector Steven Mauriello
444 Madison Avenue, 30th Floor
New York, NY 10022
(212)-371-4500
wakretz@seiffkretz.com

Bruce M. Brady (BMB4816)
CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendant
DR. LILIAN ALDANA-BERNIER
1 Whitehall Street
New York, NY 10004-2140
(212) 248-0115
bbrady@cckbblaw.com

Gregory J. Radomski (GJR2670)
MARTIN, CLEARWATER & BELL,
LLP Attorneys for Defendant
JAMAICA HOSPITAL MEDICAL CENTER
220 East 42nd Street
New York, NY 10017
(212) 697-3122
radomg@mcblaw.com

Brian E. Lee (BL9495)
IVONE, DEVINE & JENSEN, LLP
Attorneys for Defendant
ISAK ISAKOV, M.D.
2001 Marcus Avenue, Suite N100
Lake Success, New York 11042
(516) 326-2400
brianelee@idjlaw.com