

PLAINTIFF'S CONFER REQUEST TO DEFENDANTS AS PER RULE 26(f)(1)

Pursuant to Rule 26(f)(1), Federal Rules of Civil Procedure, the parties are required to confer and jointly prepare/submit a Rule 26(f) Report in connection with this matter. Accordingly, please contact the undersigned so the parties may confer in order to finalize and submit a Rule 26(f) Report as required by Rule 26(f).

The topics to be covered by the 26(f) Report are as follows:

1. Outline of Claims and Defenses
2. Facts Which Can be Stipulated to Without Discovery
3. Issues as Presently Known
4. Discovery in Phases
5. Detailed Discovery Schedule
6. Pretrial Deadlines
7. Trial and Pretrial Conference
8. Estimated Trial Length
9. Pending Motions
10. Unique Legal or Factual Aspects of Proceeding
11. Magistrate Judge
12. Likelihood of Settlement
13. Rule 26(a) Initial Disclosures

For further information, please contact STEPHEN M. GAFFIGAN, P.A. - Telephone: (954) 767-4819.

NOTE: Plaintiff hereby consents to a motion by any Defendant requesting up to a thirty (30) day enlargement of time to file a response to the Complaint. Plaintiff does not consent to any additional requested extensions, and a Request for Clerk's Default and Motion for Final Default Judgment will be filed if an answer or other response to the Complaint is not filed and served by a Defendant by the initial response deadline or any extended deadline as permitted by the Court.