

RICHARD JOHNSON & ASSOCIATES

Box 1303
Ft. Worth, Texas 75430

(817) 863 1303

(817) 329 7294 (FAX)

May 1, 2008

Via FAX (214) 426 2979

Sandra King
Bickel & Brewer
2602 Martin Luther King, Jr. Blvd
Dallas, Texas 75215

Re: Haker v Johnson; Cause # 3:CV-01-0642-P

Dear Ms. King:

I have received today an Order from the court requiring that a Joint Proposal for Contents of a Scheduling and Discovery Order in the referenced case be provided to the court on or before August 9. That being so, I believe we should immediately exchange proposed dates and required information (via FAX), discuss and agree on those we can (via FAX) and submit any non-agreed issues to the court in a Joint Proposal with my FAXed signature as quickly as we can, but in no event later than the 9th.

The following would be my proposed response to the court's requests:

- (1) Proposed time limit to file Motions to Join Additional parties and Amend Pleadings: within 30 days of Court's Scheduling Order.
- (2) Proposed time limit to file additional Motions: within 60 days of Court's Scheduling Order.
- (3) Proposed time limit to complete discovery: within 180 days of Court's Scheduling Order.
- (4) Proposal for limitations to be placed on discovery: None.
- (5) Proposed time limit to designate expert witnesses: within 30 days of Court's Scheduling Order.
- (6) Proposed trial date, estimate of number of days of trial and whether jury demanded: No earlier than 30 days of expiration of discovery deadline; 4 days; jury demanded.
- (7) Proposed date to commence settlement negotiations: within 30 days of Court's Scheduling Order.
- (8) Whether the parties will consent to trial by Magistrate: Defendant will not consent.

(9) Whether parties are considering mediation: Defendant feels mediation could be helpful.

(10) Any other proposals regarding scheduling or discovery: None.

(11) Any other relevant matters: None.

If you will review these and either agree or disagree, then put a final format of the Report into a FAX to me, I will sign it immediately upon receipt and we should be able to have it ready for you to file well in advance of August 9th.

Sincerely,

Robert Johnson

cc: Clerk of court

Word Count - 365
Cost (General) - \$4.56