

Lori V. Berke (#015628)
Anelisa Benavides (#036446)
BERKE LAW FIRM, PLLC
1601 N. 7th Street, Suite 360
Phoenix, AZ 85006
Phone: (602) 254-8800
Fax: (602) 254-8808
lori@berkelawfirm.com
anelisa@berkelawfirm.com
Attorneys for Defendant Big Brothers Big Sisters of America

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

John CD Doe, a single man,

Plaintiff,

vs.

Case No. CV2020-014920

**STIPULATED MOTION TO AMEND
SCHEDULING ORDER AND RESET
TRIAL SETTING CONFERENCE**

Big Brothers Big Sisters of America, a
District of Columbia, non-profit
corporation; Big Brothers Big Sisters of
Central Arizona, an Arizona corporation;
John Doe 1-100; Jane Doe 1-100; and Black
& White Corporations 1-100,

Defendants.

(THIRD REQUEST)

(Assigned to the Hon. Christopher Whitten)

Plaintiff John CD Doe and Defendants Big Brothers Big Sisters of America and Big Brothers Big Sisters of Central Arizona (collectively, the “Parties”), hereby submit this joint stipulation and motion to amend the Second Amended Scheduling Order in this case for the reasons set forth below.

The current remaining case deadlines are as follows:

The parties will complete deposition of all lay witnesses	12-06-2024
Plaintiff shall disclose the identity and opinions of experts	12-20-2024
Defendants shall disclose the identity and opinions of experts	02-17-2024

Each party shall provide a final supplemental disclosure	02-28-2025
The parties shall simultaneously disclose their rebuttal expert opinions	03-21-2025
The parties will complete depositions of expert witnesses	03-28-2025
The parties will complete all other discovery	03-28-2025
The parties shall participate in private mediation or settlement conference	04-11-2025
The parties shall file all dispositive motions	05-02-2025
Trial Setting Conference	07-24-2025 8:45 a.m.

Disclosures and discovery in this matter have advanced but have yet to be completed. All of Plaintiff's voluminous medical records that have been requested from his medical providers have finally been received and have been produced. In addition to obtaining Plaintiff's medical records, Defendant Big Brothers Big Sisters of America served a Subpoena on the Social Security Administration to obtain Plaintiff's benefit records, the return date for which was June 20, 2024. Those records were only recently received, are voluminous and will need to be reviewed prior to scheduling Plaintiff's deposition. Additionally, undersigned counsel, Lori Berke, has a significant trial scheduled for December 6, 2024 for which she will need much of that week to prepare for. Ms. Berke was also just retained as co-counsel in a civil action that has depositions scheduled through the weeks of December 9, 2024 and December 16, 2024 which then leads into the Christmas and New Year holidays. Therefore, the Parties request that the Court amend the Second Amended Scheduling Order and extend the remaining case deadlines for a period of forty-five days as follows:

The parties will complete deposition of all lay witnesses	02-07-2025
Plaintiff shall disclose the identity and opinions of experts	02-21-2025
Defendants shall disclose the identity and opinions of experts	04-21-2025
Each party shall provide a final supplemental disclosure	04-28-2025

1	The parties shall simultaneously disclose their rebuttal expert	05-23-2025
2	opinions	
3	The parties will complete depositions of expert witnesses	05-30-2025
4	The parties will complete all other discovery	05-30-2025
5	The parties shall participate in private mediation or settlement	06-13-2025
6	conference	
7	The parties shall file all dispositive motions	07-03-2025
8	Trial Setting Conference	

9 As a result of the extensions, the Parties request that the Trial Setting Conference be
10 rescheduled to a date in July 2025. This request is not made for the purpose of delay or for
11 any improper reason. Counsel for all parties have approved this stipulation and the proposed
12 Third Amended Scheduling Order lodged herewith.

13 DATED this 6th day of December, 2024.

14 BERKE LAW FIRM, PLLC

15 By /s/ Lori V. Berke

16 Lori V. Berke

17 Anelisa Benavides

18 *Attorneys for Defendant Big Brothers Big Sisters of America*

19 QUARLES & BRADY LLP

20 By /s/ Jeffrey D. Gardner (with permission)

21 John M. O'Neal

22 Jeffrey D. Gardner

23 Anthony F. Pusateri

24 *Attorneys for Defendant Big Brothers Big Sisters of*
25 *Central Arizona*

1 MONTROYA, LUCERO & PASTOR, P.A.

2 By /s/Robert E. Pastor (with permission)
3 Robert E. Pastor

4 *Attorneys for Plaintiff*

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6 The foregoing document was e-filed this
7 6th day of December 2024, and a copy
8 e-served via AZTurboCourt and e-mailed to:

9 Robert E. Pastor
10 Montoya, Lucero & Pastor, P.A.
11 3200 N. Central Ave., Suite 2550
12 Phoenix, AZ 85012
13 pastor@mlpattorneys.com

14 David L. Abney
15 Ahwatukee Legal Office, P.C.
16 P.O. Box 50351
17 Phoenix, AZ 85076
18 abneymaturin@aol.com

19 Michael S. Daoudi
20 Law Offices of Michael S. Daoudi, PC
21 346 Park Street, Suite 120
22 Birmingham, Michigan 48009
23 (248) 220-4377
24 msd@msd4law.com

25 Attorneys for Plaintiff CD-Doe

26 John O'Neal
27 Anthony F. Pusateri
28 Jeffrey D. Gardner
Quarles & Brady LLP
One Renaissance Square
Two North Central Avenue, Suite 600
Phoenix, AZ 85004-2322
John.ONeal@quarles.com
Anthony.Pusateri@quarles.com
Jeff.Gardner@quarles.com

*Attorneys for Defendant Big Brothers Big Sisters
Of Central Arizona*

By /s/ Laine M. Roberts