

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA**

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GEORGE SHORT)	
)	Case Number 1:05-cv-01034-RMU
Plaintiff,)	
)	
v.)	
)	
MICHAEL CHERTOFF)	
)	
Defendant.)	
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JOINT LOCAL RULE 16.3 REPORT

This is an action brought by Plaintiff George Short against Defendant U.S. Department of Homeland Security. Plaintiff alleges that Defendant intentionally discriminated against him based on race, age, and disability in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, the Age Discrimination in Employment Act (ADEA) 29 U.S.C. §621-634 and the Fair Labor Standards Act (FLSA), Title 29, U.S.C. § 201 et seq., and the D.C. Human Rights Act. Plaintiff is a black male, over the age of forty, and has citizenship under the laws of the State of Maryland. The Plaintiff was an employee of the Defendant at all times pertinent to the action. Defendant, the Department of Homeland Security is an agency of the federal government and operates under the laws of the United States Government. This Report is submitted to the Court in accordance with Local Rule 16.3(d) and the Court's standing order.

1. **Dispositive Motions**: Plaintiff and Defendant (The Parties) may file dispositive motions in this case after the close of discovery in this case.

2. **Joinder or Parties/Amendment of Complaint/Narrowing of Issues**: At this time, Plaintiff does not expect any additional parties to be joined. If necessary, the Parties may amend the pleadings.

3. **Magistrate**: The Parties do not consent to referral of this case to a magistrate judge.

4. **Possibility of Settlement**: The Parties believe that there is a possibility of settling this case.

5. **ADR**: Prior to attempting ADR or mediation in this case, the Parties would like to engage in discovery.

6. **Motions**: The Parties may file dispositive motions at the close of discovery. The Parties agree that any motion for summary judgment should be filed within forty-five (45) days after the close of discovery; any opposition thereto should be filed within thirty (30) days after the filing of the dispositive motion; and any reply should be filed within fifteen (15) days after the filing of any opposition to the motion.

7. **Initial disclosure**: The Parties will exchange initial disclosures at the time set forth under Rule 26(a) of the Federal Rules of Civil Procedure.

8. **Discovery**: The Parties request that the Court allow 180 days for discovery in this case, including expert discovery, if any. The Parties propose a limitation of ten depositions per side, 25 interrogatories per side, 35 document requests per side, 20 requests for admission per side, and that in all other respects the standard limits on discovery, pursuant to the federal and local rules, shall apply.

9. **Experts**: The Parties may retain expert witnesses. The Parties agree that expert disclosures should be due 30 days before the close of discovery in this case.

10. **Class Action**: N/A

11-13. **Pretrial and Trial**: The Parties do not believe that bifurcation of trial or discovery is appropriate. The Parties propose that the date for the pretrial conference be set within 60 days after the close of discovery, or if a dispositive motion is filed at the close of discovery, within 60 days following, the Court's ruling on that motion. Any trial date for this case should be set at the pretrial conference.

14. The Parties suggest that the pretrial motions practice, exchange of witness lists, etc. should be discussed during the pretrial conference.

Respectfully submitted,

/s/

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