

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN NORRIE,)	
)	
Plaintiff)	
)	CIVIL ACTION NO. 1:10-CV-10011-JLT
vs.)	
)	
HEWLETT-PACKARD)	
COMPANY,)	
)	
Defendant)	

LOCAL RULE 16.1 JOINT STATEMENT

Pursuant to Local Rule 16.1, the plaintiff, John Norrie and the defendant Hewlett-Packard Company submit the following joint statement.

1. AGENDA OF MATTERS TO BE DISCUSSED

- A. Proposed Case Schedule.
- B. Response to Settlement Proposal.
- C. Discussion of Alternate Dispute Resolution.
- D. Status of Fed. R. Civ. P. 26 (a)(1) Automatic Disclosure.

2. PROPOSED PRE-TRIAL SCHEDULE

- A. Automatic disclosures by August 4, 2010.
- B. Fact discovery by May 1, 2011.
- C. Plaintiff's expert disclosures by June 15, 2011.
- D. Defendant's expert disclosure by July 15, 2011.
- E. Dispositive motions filed by September 15, 2011.
- F. Final Pre-Trial Conference by October 30, 2011.

3. **CONSENT TO TRIAL BY MAGISTRATE JUDGE**

At this time the parties cannot reach agreement as to whether this case should be tried before a Magistrate Judge.

4. **SETTLEMENT PROPOSALS**

Plaintiff counsel forwarded a 93(a) demand letter to the defendant on September 9, 2009 offering to release the defendant for \$750,000.00. No offer of settlement has been made at this time.

5. **CERTIFICATION OF CLIENT CONFERENCE PURSUANT TO LOCAL RULE**


16.1(D)(3)

Counsel, by their signatures upon this Statement, certify they have each discussed with their respective clients;

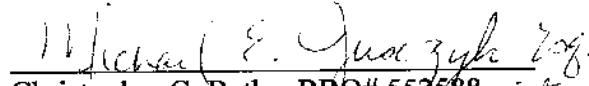
- a. proposed litigation budgets, and
- b. the potential resolution of this matter through alternative dispute resolution programs.

By separate documents, each attorney will supply the court with their respective client's certificate that such discussions have occurred.

John Norrie
By His Attorney,


Francis J. Lynch, BBO# 308740
Peter E. Heppner, BBO# 559504
Lynch & Lynch
45 Bristol Drive
South Easton, MA 02375
(508) 230-2500

Hewlett Packard Company
By Its Attorney,


Christopher G. Betke, BBO# 552588 *int*
Michael E. Jusczyk, BBO# 669893
Coughlin Betke, LLP
175 Federal Street
Boston, MA 02110
(617) 988-8050

I hereby certify that the attached document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants upon receipt of notification of same from the court.

/s/ Peter E. Heppner

Peter E. Heppner, BBO # 559 504
Lynch & Lynch
45 Bristol Drive
South Easton, MA 02375
(508) 230-2500