

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
v.)	Civil Action No. 05-11484-PBS
RAYMOND S. SANTOS,)	
Defendant.)	

THE PARTIES' JOINT STATEMENT

I. SCHEDULING ORDER

In accordance with Fed. R. Civ. P. 16(b) and Local Rule 16.1, the plaintiff in the above-captioned matter hereby proposes the following scheduling order:

1. All factual discovery, including all depositions of fact witnesses, shall be completed by April 30, 2006.
 - (a) The parties will serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(E)(vi) within two weeks of the scheduling conference.
 - (b) All discovery motions under Fed. R. Civ. P. 37 pertaining to factual discovery shall be filed on or before March 31, 2006.
2. Expert discovery: the plaintiff does not anticipate calling any expert witnesses at this time.
3. All dispositive motions shall be filed on or before May 31, 2006.
4. The final pretrial conference shall be scheduled by order of the Court.
5. The trial shall be scheduled by order of the Court.

II. TRIAL BEFORE A MAGISTRATE

The plaintiff consents to a trial before a Magistrate Judge.

III. CERTIFICATIONS

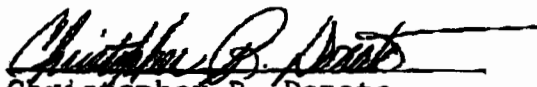
Counsel for the United States of America has conferred with a representative from the Department of Health and Human Services as to establishing a budget or cost for the litigation and with respect to ADR programs. The United States certificate shall be filed on or before December 29, 2005.

Respectfully submitted,

PLAINTIFF,

UNITED STATES OF AMERICA

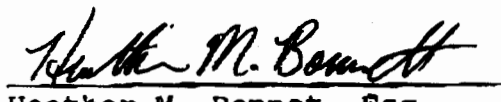
By its attorney,


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DEFENDANT,

RAYMOND S. SANTOS

By his attorney,


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