

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

-----x
COREY D. CLARK

Plaintiff,

-vs-

VIACOM INTERNATIONAL, INC.
VIACOM, INC.
JIM CANTIELLO
JOHN DOES 1-20

Defendants.
-----x

CASE NO. 3:12-CV-00675

CHIEF JUDGE HAYNES

ECF – JURY TRIAL

Quinn
Turner
ERANDER
conference
Delga January
4,
2013
at
2:00
pm

**PLAINTIFF’S FIRST MOTION FOR CASE MANAGEMENT CONFERENCE PURSUANT
TO LR 16.01 TO DISCUSS PRE-TRIAL DISPOSITIVE MOTIONS, AMENDED
PLEADINGS, JOINDER OF ADDITIONAL PARTIES TO ACTION, AND MATTERS
RELATING TO EFFICIENT ADMINISTRATION OF PLAINTIFF’S CLAIMS AND THE
HONORABLE COURT’S DOCKET**

UPON GOOD CAUSE SHOWN, and pursuant to LR16.01(d)(4)(c) and (d) of the Local Rules of Court, and upon the attached Attorney’s Affirmation in Good Faith of James H. Freeman (“Counsel”), dated December 12, 2012, Plaintiff Corey D. Clark (“Plaintiff”) respectfully requests the scheduling of a *case management conference*¹ before the Honorable Court at the earliest convenience² of the Honorable Court and at the convenience of opposing counsel.

Will
12/14/12

In support hereof, Plaintiff refers to Local Rule 16.01(d)(4), which provides that “any party may file a motion . . . to request a case management conference with the case management judge at any stage of the proceeding.” LR16.01(d)(4); see also LR16.01(d) (“[s]ubsequent case management conferences may be scheduled . . . at the request of any party.”).

¹ Counsel prefers an in-person conference attended by all parties although submits that a teleconference may suffice at the discretion and convenience of the Honorable Court.

² Plaintiff presupposes that in light of the holiday season, such conference – if at all - may not take place before January 2013; however, Plaintiff’s counsel stands ready, willing and able to attend such conference in person or telephonically if scheduled at any time before the new year.