

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

PROJECT VOTE, et al.

Plaintiffs,

v.

J. KENNETH BLACKWELL, et al.

Defendants.

CIVIL ACTION NO. 1:06-cv-01628

Judge Kathleen M. O'Malley

**JOINT POSITION STATEMENT**  
**REGARDING AGENDA FOR CASE**  
**MANAGEMENT CONFERENCE**

ALL PARTIES pursuant to Local Rule 16.3, hereby submit the following statement of their positions regarding the agenda for the Case Management Schedule Conference to be held on August 17, 2006:

1. This case should be assigned to the following track: STANDARD, WITH AN EXPEDITED SCHEDULE FOR PRELIMINARY RELIEF.
2. The parties AGREE this case should be designated for electronic filing.
3. This case IS NOT suitable for Alternative Dispute Resolution.
4. ALL PARTIES DO NOT consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).
5. ALL PARTIES will voluntarily disclose the following discovery information at or before the conference: THE PARTIES DO NOT ANTICIPATE, AT THIS TIME, DISCLOSURE OF DISCOVERY INFORMATION PRIOR TO THE CONFERENCE.

6. ALL PARTIES request that discovery of the following type and extent be allowed in this case: THE PARTIES ARE UNCERTAIN AT THIS TIME THAT FORMAL DISCOVERY WILL BE NECESSARY.
7. ALL PARTIES request that discovery cutoff date be set on JANUARY 2, 2007 (180 days).
8. PLAINTIFFS shall provide Expert Reports on or before OCTOBER 4, 2006, and DEFENDANTS shall provide Expert Reports on or before NOVEMBER 3, 2006, Expert Discovery shall be completed on or before JANUARY 2, 2007.
9. ALL PARTIES request that new parties be joined and the pleadings be amended on AUGUST 31, 2006 (14 days after the Case Management Conference).
10. ALL PARTIES request that the dispositive motion cutoff date be set 30 DAYS AFTER THE STATUS CONFERENCE.
11. ALL PARTIES request that the Status Hearing be held AT THE PLEASURE OF THE COURT AFTER JANUARY 2, 2007.

Respectfully submitted,

/s/ Donald J. McTigue

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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was electronically filed this 10<sup>th</sup> day of August, 2006. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this through the Court's system.

/s/ Donald J. McTigue

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Donald J. McTigue, Attorney at Law