

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

In the Matter of)	
)	
DYNAMIC HEALTH OF FLORIDA, LLC)	PUBLIC
CHHABRA GROUP, LLC)	
DBS LABORATORIES, LLC)	Docket No. 9317
VINEET K. CHHABRA aka VINCENT K. CHHABRA, and)	
JONATHAN BARASH,)	
Respondents.)	
)	

To: Stephen J. McGuire
Chief Administrative Law Judge

JOINT MOTION REGARDING SCHEDULE

Complaint counsel and counsel for respondents Dynamic Health of Florida, LLC, Chhabra Group, LLC, and Vineet K. Chhabra hereby propose the following pre-hearing schedule:

10/15/04	Commencement of Discovery. Complaint Counsel provides preliminary witness list (not including experts) with description of proposed testimony.
10/25/04	Respondents' Counsel provides preliminary witness lists (not including experts) with description of proposed testimony.
11/2/04	Deadline for issuing document requests, requests for admission, interrogatories and subpoenas <i>duces tecum</i> , except for discovery purposes of authenticity and admissibility of exhibits.
11/5/04	Complaint Counsel provides expert witness list.
11/15/04	Respondents' Counsel provides expert witness list.
11/29/04	Complaint Counsel provides expert witness reports.
12/6/04	Respondents' Counsel provides expert witness reports.
1/14/05	Close of discovery, other than discovery permitted under Rule 3.24(a)(4), depositions, and discovery for purposes of authenticity and admissibility of exhibits.

1/17/05	Complaint Counsel to identify rebuttal expert(s) and provide rebuttal expert report(s). Any such reports are to be limited to rebuttal of matters set forth in Respondents' expert reports. If material outside the scope of fair rebuttal is presented, respondents will have the right to seek appropriate relief (such as striking Complaint Counsel's rebuttal expert reports or seeking leave to submit sur-rebuttal expert reports on behalf of Respondents).
2/11/05	Deadline for all depositions.
2/28/05	Deadline for filing motions for summary decision.
3/10/05	Deadline for filing responses to motions for summary decision.
3/14/05	<p>Complaint Counsel provides to Respondents' counsel its final proposed witness and exhibit lists, including designated testimony to be presented by deposition, copies of all exhibits (except for demonstrative, illustrative or summary exhibits) and a brief summary of the testimony of each witness.</p> <p>Complaint Counsel serves courtesy copies on ALJ of its final proposed witness and exhibit lists and a brief summary of the testimony of each witness.</p>
3/18/05	Parties that intend to offer into evidence at the hearing confidential materials of an opposing party or non-party must provide notice to the opposing party or non-party, pursuant to 16 C.F.R. § 3.45(b).
3/18/05	<p>Respondents' Counsel provides to Complaint Counsel its final proposed witness and exhibit lists, including designated testimony to be presented by deposition and copies of all exhibits (except for demonstrative, illustrative or summary exhibits) and a brief summary of the testimony of each witness.</p> <p>Respondents' Counsel serves courtesy copies on ALJ of its final proposed witness and exhibit lists and a brief summary of the testimony of each witness.</p>
3/28/05	Deadline for filing motions <i>in limine</i> and motions to strike.
4/4/05	Deadline for filing motions for <i>in camera</i> treatment of proposed trial exhibits.
4/11/05	Exchange and serve courtesy copy of ALJ objections to final proposed witness lists and exhibit lists. Exchange objections to the designated testimony to be presented by deposition and counsel designations.

4/15/05	Exchange proposed stipulations of law, facts and authenticity.
4/18/05	Parties file pretrial briefs.
4/20/05	File final stipulations of law, facts and authenticity. Any subsequent stipulations may be filed as agreed by the parties.
4/25/05	Final prehearing conference to be held at 10:00 a.m. in room 532, Federal Trade Commission Building, 600 Pennsylvania Avenue, N.W., Washington, D.C. The parties are to meet and confer prior to the conference regarding trial logistics and proposed stipulations of law, facts and authenticity and any designated deposition testimony. Counsel may present any objections to the final proposed witness lists and exhibits, including the designated testimony to be presented by deposition. Trial exhibits will be admitted or excluded to the extent practicable.
5/2/05	Trial commences.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of August, 2004, filed and served the attached **JOINT MOTION REGARDING SCHEDULE** upon the following as set forth below:

Donald S. Clark
Secretary
FTC, Room 172
600 Pennsylvania Ave., NW
Washington, D.C. 20580
via electronic mail and hand-delivery

The Honorable Stephen J. McGuire
Chief Administrative Law Judge
FTC, Room 112
600 Pennsylvania Ave., NW
Washington, D.C. 20580
via electronic mail and hand-delivery

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