

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

PERRI "PEBBLES" REID, )  
)  
Plaintiff, )  
)  
v. )  
)  
VIACOM INTERNATIONAL INC., )  
*et al.*, )  
)  
Defendants. )

Case No. 1:14-cv-01252-MHC

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Plaintiff and Defendants move the Court to amend the scheduling order to allow, upon agreement, for the taking of fact depositions through the time allowed for expert discovery, showing the Court as follows:

The parties have each diligently served discovery requests upon the other, and the parties have each provided responses to those requests. The parties have also served numerous third party requests for the production of documents and testimony. Finally, two depositions have been taken and the parties have agreed upon dates for nine depositions.

Under the current scheduling order, fact depositions must be completed by June 23, 2015. Two of the deponents are not available until July of 2015 because

of a previously scheduled concert tour and health issues. Currently the scheduling order provides for a bifurcated fact and expert discovery period. The parties ask that, where the parties agree, they be allowed to continue fact depositions through and including August 7, 2015.

A proposed order is attached for the Court's convenience.

This 2nd day of April 2015.

/s/ Stacey Godfrey Evans

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*Attorneys for Plaintiff  
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/s/ Jeremy A. Chase

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*Attorneys for Defendants Viacom  
International Inc. and Viacom Inc.*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing **JOINT MOTION TO AMEND SCHEDULING ORDER** has been prepared with one of the font and point selections set forth in N.D. Ga. Local Rule 5.1B.

This 2nd day of April 2015.

/s/ Stacey Godfrey Evans  
Stacey Godfrey Evans

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **JOINT MOTION TO AMEND SCHEDULING ORDER** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

This 2nd day of April 2015.

/s/ Stacey Godfrey Evans  
Stacey Godfrey Evans

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*et al.*, )  
)  
Defendants. )

Case No. 1:14-cv-01252-MHC

**PLAINTIFF'S NOTICE OF DEPOSITION OF TIONNE WATKINS**

TO: **Defendants**, in care of their attorneys of record:

Elizabeth A. McNamara  
Jeremy A. Chase  
Davis Wright Tremaine LLP  
1633 Broadway 27th Floor  
New York, NY 10019  
[lizmcnamara@dwt.com](mailto:lizmcnamara@dwt.com)  
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Walter H. Bush  
Christopher B. Freeman  
Carlton Fields Jordan Burt, P.A.  
One Atlantic Center  
1201 West Peachtree Street  
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James Curry  
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LLP  
1901 Avenue of the Stars  
Suite 1600  
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PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. Rules 26 and 30, Plaintiff shall take the deposition of Tionne Watkins on **July 14, 2015 at 10:00AM** at the offices of **Davis Wright Tremaine LLP, 865 S. Figueroa Street, Los Angeles, CA 90017-2566**. The deposition shall be taken by stenographic transcription before a certified court reporter or any other person duly authorized to administer oaths and take testimony, and may be videotaped. The deposition shall be taken for discovery, cross examination of an opposite party, preservation of testimony for trial, and all purposes permitted by law. The deposition will continue from day to day until completed. You may attend and examine.

This 7th day of April 2015.

**L. LIN WOOD, P.C.**

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ATTORNEYS FOR PLAINTIFF

**S.G. EVANS LAW, LLC**

/s/ Stacey Godfrey Evans  
Stacey Godfrey Evans  
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State Bar No. 298555

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Atlanta, Georgia 30309  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **PLAINTIFF'S  
NOTICE OF DEPOSITION OF TIONNE WATKINS** with the Clerk of Court  
using the CM/ECF system which will automatically send e-mail notification of  
such filing to the attorneys of record.

This 7th day of April 2015.

/s/ Stacey Godfrey Evans  
Stacey Godfrey Evans

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Defendants. )

Case No. 1:14-cv-01252-MHC

**PLAINTIFF'S NOTICE OF DEPOSITION OF ROZONDA THOMAS**

TO: **Defendants**, in care of their attorneys of record:

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Jeremy A. Chase  
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PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. Rules 26 and 30, Plaintiff shall take the deposition of Rozonda Thomas on **July 8, 2015 at 10:00AM** at the offices of **Carlton Fields Jordan Burt, P.A., One Atlantic Center, 1201 W. Peachtree St. N.W., Ste. 3000, Atlanta, Georgia 30309-3455.**

The deposition shall be taken by stenographic transcription before a certified court reporter or any other person duly authorized to administer oaths and take testimony, and may be videotaped. The deposition shall be taken for discovery, cross examination of an opposite party, preservation of testimony for trial, and all purposes permitted by law. The deposition will continue from day to day until completed. You may attend and examine.

This 7th day of April 2015.

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ATTORNEYS FOR PLAINTIFF

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using the CM/ECF system which will automatically send e-mail notification of  
such filing to the attorneys of record.

This 7th day of April 2015.

/s/ Stacey Godfrey Evans  
Stacey Godfrey Evans