

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

MS.PATRICIA FLETCHER,)	
<i>et al.</i> ,)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	
LINDA LAMONE in her official)	
capacity as State Administrator of)	
Elections for the state of Maryland;)	
And ROBERT L. WALKER in his)	
official capacity as Chairman of the)	
State Board of Elections,)	
)	
Defendants.)	
<hr style="border: 0.5px solid black;"/>		
)	

Civ. Action No.: RWT-11-3220

Motion to Propose Schedule

Plaintiffs hereby move that this Court implement the following proposed schedule for the hearing and disposition of this matter. Plaintiffs believe that the evidence in this case can be substantially submitted by affidavit in the interest of time.

Plaintiffs hereby propose the following schedule:

November 30, 2011 - Defendants’ Response to Motion for Preliminary Injunction

December 2, 5, 6 or 7, 2011 – Hearing on Motion for Preliminary Injunction

December 15, 2011 – Exchange of Proposed Witness Lists

December 30, 2011 – Exchange and Filing of Initial Affidavits

January 16, 2012 – Submission of Rebuttal Affidavits

Week of January 23, 2012 - Hearing

The Court could modify the candidate qualifying dates along with MOVE Act ballot mailing and return deadlines as necessary to accommodate the currently scheduled April 3, 2012 primary election. Plaintiffs believe that the court can refrain from moving any election related deadlines until after the resolution of the Motion for Preliminary Injunction.

Counsel for Defendants indicated agreement with the portion of this proposal with respect to the preliminary injunction, but indicated they are unable to agree to any schedule that resolves any portion of this case after December 14, 2011.

Respectfully submitted,

/s/ Jason Torchinsky

Law Office of James P Mayes
James Paul Mayes (Bar No. 10414)
mayesfedlaw@aol.com
Law Office of James P Mayes
4721 Chesterfield Place
Jamestown, NC 27282
Tel: (202) 255-2031
Fax: (336)841-5275

Holtzman Vogel PLLC
Jason Torchinsky, *pro hac vice*
jtorchinsky@holtzmanlaw.net
HOLTZMAN VOGEL PLLC
45 North Hill Drive, Suite 100
Warrenton, VA 20186
Tel: (540) 341-8808
Fax: (540) 341-8809

Counsel for Plaintiffs