

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION**

PATRICK DERMESROPIAN, D.D.S.,	)	
	)	Case No. 3:09-cv-30087
Plaintiff,	)	
	)	District Judge Michael A. Ponsor
v.	)	
	)	Magistrate Judge Kenneth P. Neiman
DENTAL EXPERTS, LLC d/b/a DENTAL	)	
DREAMS, LLC, DENTAL DREAMS, LLC;	)	<b>STIPULATION TO COMPLETE</b>
FIELD OF DREAMS DENTAL	)	<b>NON-EXPERT ORAL</b>
MANAGEMENT, LLC; SAMEERA	)	<b>DISCOVERY BY APRIL 1, 2011</b>
HUSSAIN, D.D.S., KHURRAM HUSSAIN,	)	
PETER STATHAKIS, and DAVID WOLLE,	)	
	)	
Defendants.	)	

Plaintiff, Patrick Dermesropian (“Plaintiff”), and Defendants, Dental Experts, LLC, Dental Dreams LLC, Field of Dreams Dental Management, LLC, Sameera Hussain, Khurram Hussain, Peter Stathakis and David Wolle (“Defendants”), by and through their attorneys, hereby stipulate to a deadline of April 1, 2011 for the completion of oral fact discovery.

On August 16, 2010, the Court entered a Scheduling Order stating that all non-expert written discovery shall be completed by February 1, 2011. The Scheduling Order, however, does not establish a deadline for the completion of non-expert oral discovery. For purposes of clarifying this matter, the parties stipulate to complete all non-expert oral discovery by April 1, 2011. Setting a deadline of April 1, 2011 for completion of oral discovery will not require moving any other case management deadlines and, thus, will not cause any unnecessary or undue delay.

For the reasons stated above, the parties request that the Court enter the attached agreed Order setting a deadline of April 1, 2011 for the completion of all non-expert oral discovery.

Dated: January 24, 2011

Respectfully submitted,

PATRICK DERMESROPIAN

DENTAL EXPERTS, LLC; DENTAL DREAMS LLC; FIELD OF DREAMS DENTAL MANAGEMENT, LLC; SAMEERA HUSSAIN; KHURRAM HUSSAIN; PETER STATHAKIS; and DAVID WOLLE

By:     /s/ Vano I. Haroutunian    

By:     /s/ Michael R. Phillips    

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I hereby certify that I electronically filed the foregoing document with the Clerk's Office using the CM/ECF System, which automatically served a Notice of Electronic Filing and a true copy of the foregoing document upon Plaintiff's attorneys of record this 24<sup>th</sup> day of January, 2011:

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By:           /s/ Michael R. Phillips          

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