

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No. 3:23-cv-819-FDW-DCK**

**JANE DOE, BY AND THROUGH HER )  
PARENTS JANE ROE AND JOHN )  
ROE, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
AMERICAN AIRLINES, INC., ESTES )  
CARTER THOMPSON, III; and DOES )  
2-10, )  
 )  
Defendants. )  
 )**

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINES**

Having met and conferred regarding the current case schedule, Plaintiff Jane Doe, by and through her parents Jane Roe and John Roe, and Defendant American Airlines, Inc., hereby stipulate and request as follows:

WHEREAS, on December 1, 2023, Plaintiff filed her Complaint in this matter asserting claims for: (1) invasion of privacy; (2) civil liability for criminal act of secretly peeping; (3) intentional infliction of emotional distress; (4) negligent infliction of emotional distress against Defendant Estes Carter Thompson, III; (5) negligent hiring, supervision, or retention; and (6) negligent infliction of emotional distress against Defendant American Airlines, Inc.;

WHEREAS, this matter is set to proceed to a jury trial on March 3, 2025;

WHEREAS, Plaintiff and American Airlines previously filed a Joint Motion to Modify the Case Management Order;

WHEREAS, the Court denied the Joint Motion but indicated that “stipulated extensions of the deadline for completion of all discovery will not alter the dates and deadlines for filing, briefing, and hearing dispositive motions, nor to they provide grounds for a continuance of a trial setting,” and

WHEREAS, Defendant Estes Carter Thompson III is currently in federal custody and therefore, Plaintiff and American Airlines have been unable to engage in a meet and confer with Mr. Thompson on this topic;

THE PARTIES HEREBY STIPULATE AND REQUEST THAT the following deadlines be extended as follows:

	Current Deadline	Proposed Deadline
Expert Report – Plaintiff	June 20, 2024	August 23, 2024
Expert Report – Defendant	July 18, 2024	September 20, 2024
Discovery Completion	August 15, 2024	October 18, 2024
ADR	August 29, 2024	November 1, 2024

[Signatures on following page]

This the 20th day of May, 2024.

**JAMES, McELROY & DIEHL, P.A.**

s/ John R. Buric

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*Counsel for Plaintiff Jane Doe*

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s/ Paul T. Llewellyn

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*Counsel for Plaintiff Jane Doe*

**WILSON, ELSER, MOSKOWITZ,  
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s/ Kathryn A. Grace

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*Counsel for Defendant American Airlines,  
Inc.*

**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, and good cause showing, it is hereby ORDERED that the following deadlines shall be extended as follows:

	Current Deadline	Proposed Deadline
Expert Report – Plaintiff	June 20, 2024	August 23, 2024
Expert Report – Defendant	July 18, 2024	September 20, 2024
Discovery Completion	August 15, 2024	October 18, 2024
ADR	August 29, 2024	November 1, 2024

All other pre-trial dates shall remain unchanged.

IT IS SO ORDERED.

DATED: May \_\_\_\_, 2024

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Frank D. Whitney  
United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned certifies that this **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES** has this date been served as follows:

By filing such document on the Court’s CM/ECF system, which will transmit notification of such filing, constituting service thereof, to Defendant American Airlines, Inc.’s counsel of record as follows:

Kathryn Anne Grace – [Kathryn.Grace@wilsonelser.com](mailto:Kathryn.Grace@wilsonelser.com)

Kayla Joanne Jones – [kayla.jones@wilsonelser.com](mailto:kayla.jones@wilsonelser.com)

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Chandler M. Teraoka – [chandler.teraoka@wilsonelser.com](mailto:chandler.teraoka@wilsonelser.com)

By depositing a copy thereof in the United States Mail, sufficient first-class postage prepaid, addressed as follows to Estes Carter Thompson, III:

Estes Carter Thompson, III  
1228 Duncan Gardens Drive  
Charlotte, NC 28206

Estes Carter Thompson, III  
Donald W. Wyatt Detention Facility  
950 High Street  
Central Falls, RI 02863

This the 20th day of May, 2024.

**LEWIS & LLEWELLYN LLP**

s/ Paul T. Llewellyn  
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