

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FILED

JAN - 9 2020

**Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia**

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MIKHAIL FRIDMAN, PETR AVEN,	:	
and GERMAN KHAN,	:	
	:	
Plaintiffs,	:	
	:	
-v-	:	Case 1:17-CV-02041 (RJL)
	:	
BEAN LLC (A/K/A FUSION GPS) and	:	
GLENN SIMPSON,	:	
	:	
Defendants.	:	
-----X	:	

CONSENT ORDER MODIFYING THE SCHEDULING ORDER

WHEREAS, Pursuant to Fed. R. Civ. P. 16 and Local Civil Rule 16.4, the Parties filed a joint motion to modify the Scheduling Order entered in this proceeding;

WHEREAS the Parties filed an Amended Joint Case Management Report on September 4, 2019 (Dkt. 64).

WHEREAS the Amended Joint Case Management Report proposed, in relevant part, the following discovery schedule:

- The parties shall complete document production by January 6, 2020.
- The parties shall serve requests for admission by February 21, 2020.
- Fact discovery shall close on November 13, 2020.
- The parties shall exchange expert reports by December 21, 2020.
- The parties shall complete expert depositions by February 5, 2021.
- Motions for summary judgment due on March 19, 2021.
- Opposition to summary judgment motions due on April 23, 2021.
- Replies on summary judgment motions due on May 14, 2021.

WHEREAS the Court adopted the Parties' proposed discovery deadlines in its September 11, 2019 Scheduling Order (Dkt. 65), including the deadlines for service of initial document

requests and interrogatories and answers to interrogatories and written responses and objections to document requests.

WHEREAS, the Parties agreed to serve initial document requests and interrogatories by October 11, 2019, and answers and objections to interrogatories and written responses and objections to initial document requests within thirty (30) days of service (i.e., by November 11, 2019); the Parties filed a Consent Order to Modify the Scheduling Order (Dkt. 68); and the Court, in a Minute Order dated November 5, 2019, modified the Scheduling Order accordingly;

WHEREAS the Parties served extensive document requests and interrogatories in October 2019, and responses and objections thereto in November 2019, in accordance with the modified Scheduling Order;

WHEREAS the initial Scheduling Order provides for the Parties' completion of document production on January 6, 2020, however the Parties have conferred in good faith and agree that an additional three months will be required for the Parties to confer regarding their respective objections and responses and to complete the Parties' document production;

WHEREAS the Parties expect that there will be significant non-party discovery, including witnesses and documents overseas, as indicated in the Parties Amended Joint Case Management Report (Dkt. 64), and, accordingly, the Court finds that good cause exists for the other dates in the Scheduling Order to be modified accordingly.

NOW, THEREFORE, IT IS HEREBY ORDERED that:

The September 11, 2019 Scheduling Order is revised as follows:

(1) Discovery shall proceed pursuant to the following schedule:

- a. The parties shall complete document production by **April 6, 2020**.
- b. The parties shall serve requests for admission by **May 27, 2020**.

- c. Fact discovery shall close on **January 12, 2021**.
- d. The parties shall exchange expert reports by **March 1, 2021**.
- e. The parties shall complete expert depositions by **May 16, 2021**.

(2) Schedule for motions for summary judgment:

- a. Motions due on **June 30, 2021**.
- b. Oppositions due on **August 4, 2021**.
- c. Replies due on **August 25, 2021**.

Subject to the Court's availability, a pre-trial conference shall be held on

the week of September 27, 2021.

SO ORDERED



RICHARD J. LEON
United States District Judge

1/7/20