

# **EXHIBIT A**

**DEFENDANTS' PROPOSED CASE SCHEDULE**

<b>Event</b>	<b>Date</b>
Answers to Complaint due	March 14
Parties exchange preliminary non-expert witness lists	March 15
Parties exchange supplemental non-expert witness lists	April 11
Plaintiffs' Rule 26 expert reports and corresponding expert materials set forth in paragraph 17(b) below due	April 25
Close of fact discovery	May 3
Defendants' Rule 26 expert reports and corresponding expert materials set forth in paragraph 17(b) below due	May 16
Parties exchange exhibit lists & affirmative deposition designations	May 20
Each Party informs each non-Party of all documents produced by that non-Party that are on the Party's exhibit list and all depositions of that non-Party that have been designated by any Party. Parties must inform non-Parties that they should provide notice to the Parties, pursuant to the Protective Order, of whether that non-Party objects to the potential public disclosure at trial of that non-Party's documents and depositions, explain the basis for any such objections, and propose redactions where possible.	May 22
Plaintiff rebuttal expert reports (if any) & corresponding expert materials set forth in paragraph 17(b) below due (limited to 10 pages each)	May 23
Parties exchange counter deposition designations	May 24
Non-Parties provide notice whether they object to the potential public disclosure at trial of any non-Party documents and depositions, explain the basis for any such objections, and propose redactions where possible	May 24
Parties and non-Parties meet and confer regarding confidentiality of non-Party documents on trial exhibit list and non-Party depositions on or before	May 27
Each side exchanges its objections to the other side's exhibits and deposition designations	May 30
Depositions of all experts to be complete on or before	May 31
Dispositive Motions (if any) due on or before (briefing schedule to be determined if/when motions filed)	May 31
Parties exchange final non-expert witness lists in accordance with paragraph 18(b) below	May 31
Plaintiffs' pretrial brief due	June 1
Motions <i>in limine</i> due	June 1
Parties meet and confer regarding exhibit disputes & deposition designations on or before	June 2
Joint submission regarding disputes about admissibility of trial exhibits, confidentiality issues and deposition designations	June 6
Oppositions to motions <i>in limine</i> due	June 9
Defendants' responsive pretrial brief due	June 10
Final pretrial conference	June 15
Trial begins	June 20
Post-trial briefs and proposed findings of fact and conclusions of law due	Parties will propose timing at the final pretrial conference.