

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and
PENGUIN RANDOM HOUSE LLC

Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through
5, inclusive

Defendants.

Case No. 1:20-CV-04160-JGK

**JOINT STIPULATION AND [PROPOSED] ORDER
SETTING DISCOVERY DEADLINES**

This joint stipulation was entered into on the 5 day of October 2020, by
and among counsel for the Plaintiffs and Defendant in the above-captioned action.

WHEREAS, the parties timely submitted a Rule 26(f) statement on August 28, 2020;

WHEREAS, the Court issued a Scheduling Order on September 1, 2020;

WHEREAS, the parties have subsequently conferred and agree that stipulating to
additional discovery-related deadlines would facilitate efficient case management;

WHEREAS, the deadlines to which the parties HEREBY stipulate do not conflict with
the deadlines set by the Court's September 1 order;

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NOW, THEREFORE, the parties jointly stipulate to the following supplemental discovery deadlines:

EVENT	DEADLINE
Deadline to complete fact discovery	May 21, 2021
Deadline to complete expert disclosures on issues where parties bear burden of proof	July 6, 2021
Deadline to serve rebuttal expert disclosures	August 20, 2021

IT IS SO STIPULATED.

Dated: October 8, 2020

DAVIS WRIGHT TREMAINE LLP

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