

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

ASSA ABLOY AB, *et al.*,

*Defendants.*

Civil No. 1:22-cv-02791-ACR

**JOINT STATUS REPORT**

The parties respectfully submit the following status report pursuant to the Court’s Minute Order dated March 8, 2023. The parties are currently complying with deadlines set forth in the Pre-Trial Schedule entered by the Court on February 24, 2023 (ECF No. 91). While the parties may ultimately have pretrial disputes regarding motions *in limine* and experts, there are no ripe disputes for the Court to address at this time, and the parties expect to substantially narrow any disputes regarding exhibits and deposition designations at the meet and confers scheduled to begin on March 15, 2023.

Judge Jackson set forth various procedures for the submission of expert reports, deposition designations, exhibits, and post-trial briefing in a Supplement to the Case Management Order (“Order”) (ECF No. 51). The parties welcome any further guidance from the Court regarding these submissions. Additionally, while the Order requires using black and red boxes around certain categories of designated testimony, using brackets, as illustrated in the attached mock-up of hypothetical designated testimony, would reduce the burden on the parties because of software limitations, if such an approach is acceptable to the Court. *See Exhibit A.*

Dated: March 13, 2023

Respectfully submitted,

/s/ David Dahlquist

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