

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUAD/GRAPHICS, INC., QLC MERGER
SUB, INC., and LSC COMMUNICATIONS,
INC.

Defendants.

Civil Action No. 1:19-cv-04153

Hon. Charles R. Norgle

[PROPOSED] SCHEDULING ORDER

The Court hereby adopts the following schedule for discovery and a trial on the merits in this matter.

Event	Date
Fact discovery begins	Upon the filing of this proposed Order
Parties produce Investigation Materials	One business day following entry of a Protective Order in this action
Answers to Complaint due	Five business days after entry of this Order
Deadline for amendments to pleadings and for joining parties	Seven business days after Defendants file their Answers
Parties exchange preliminary trial witness lists	July 22, 2019
Parties exchange final trial witness lists	August 5, 2019
Close of fact discovery and Supplemental Discovery	August 23, 2019
Plaintiff serves its Rule 26(a)(2)(B) initial expert witness disclosures containing complete statements of all opinions the expert witness will express at trial, and the basis and reasons for those opinions.	August 23, 2019

Defendants serve their Rule 26(a)(2)(B) initial expert witness disclosures containing complete statements of all opinions the expert witness will express at trial, and the basis and reasons for those opinions.	August 30, 2019
Parties exchange trial exhibit lists and opening deposition designations	September 4, 2019
Plaintiff serves its draft proposed stipulations and uncontested facts, pursuant to LR 16.1(c)	September 4, 2019
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 for use at trial	September 5, 2019
Plaintiff serves Rule 26(a)(2)(D)(ii) expert witness disclosures as to matters intended solely to contradict or rebut evidence on the same subject matter identified by Defendants under Rule 26(a)(2)(B)	September 6, 2019
Parties meet and confer regarding proposed stipulations and uncontested facts, pursuant to LR 16.1	September 9, 2019
Defendants serve Rule 26(a)(2)(D)(ii) expert witness disclosures as to matters intended solely to contradict or rebut evidence on the same subject matter identified by Plaintiff under Rule 26(a)(2)(B)	September 11, 2019
Parties exchange their objections to the other side's trial exhibits and opening deposition designations and serve their deposition counter-designations	September 11, 2019
Non-parties provide notice of whether they object to public disclosure at trial of their documents and/or depositions, explain the basis for any such objection, and propose redactions where possible	September 13, 2019
All motions <i>in limine</i> to be filed	September 13, 2019
Parties exchange their objections to the other side's deposition counter-designations and serve their counter-counter-designations	September 17, 2019
Parties and non-parties meet and confer regarding confidentiality of non-parties' documents on trial	September 18, 2019

exhibit lists and non-party depositions to be used at trial	
Parties meet and confer regarding admissibility of all trial exhibits and deposition designations	September 19, 2019
Parties meet and confer to resolve disputes regarding confidentiality of Party documents on trial exhibit lists	September 19, 2019
Close of expert discovery	September 19, 2019
Parties submit proposed joint pretrial order, pursuant to LR 16.1	September 20, 2019
Oppositions to motions <i>in limine</i> to be filed	September 20, 2019
Replies in support of motions <i>in limine</i> to be filed	September 24, 2019
Joint submission to be filed regarding any remaining disputes as to admissibility of trial exhibits and deposition designations	September 24, 2019
Joint submission to be filed regarding any remaining disputes as to confidentiality of Party documents on trial exhibit lists	September 24, 2019
Joint submissions to be filed regarding any remaining disputes as to confidentiality of non-parties' documents on trial exhibit lists and non-party depositions to be used at trial	September 24, 2019
Pretrial briefs to be filed	September 24, 2019
Final pretrial conference	September 26, 2019 , or at the Court's earliest convenience thereafter
Parties submit final lists of trial exhibits to the Court	September 26, 2019
Parties submit written direct testimony to the Court	September 26, 2019
Parties file proposed findings of fact and conclusions of law, with citations by paragraph number to relevant written direct testimony	September 30, 2019
First day of trial	October 1, 2019 , or at the Court's earliest convenience thereafter, with the trial expected to last 6 days
Post-trial briefs to be filed	One week after trial concludes

SO ORDERED:

CHARLES R. NORGLÉ
United States District Judge

Dated: July __, 2019