

# **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.

<b>Event</b>	<b>Date</b>
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	<b>July 22, 2019</b>
Parties exchange final trial witness lists	<b>August 5, 2019</b>
Close of fact discovery and Supplemental Discovery	<b>August 23, 2019</b>
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.	<b>August 23, 2019</b>

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.	<b>August 30, 2019</b>
Parties exchange trial exhibit lists and opening deposition designations	<b>September 4, 2019</b>
Plaintiff serves its draft proposed stipulations and uncontested facts, pursuant to LR 16.1(c)	<b>September 4, 2019</b>
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	<b>September 5, 2019</b>
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)	<b>September 6, 2019</b>
Parties meet and confer regarding proposed stipulations and uncontested facts, pursuant to LR 16.1	<b>September 9, 2019</b>
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)	<b>September 11, 2019</b>
Parties exchange their objections to the other side's trial exhibits and opening deposition designations and serve their deposition counter-designations	<b>September 11, 2019</b>
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	<b>September 13, 2019</b>
All motions <i>in limine</i> to be filed	<b>September 13, 2019</b>
Parties exchange their objections to the other side's deposition counter-designations and serve their counter-counter-designations	<b>September 17, 2019</b>
Parties and non-parties meet and confer regarding confidentiality of non-parties' documents on trial	<b>September 18, 2019</b>

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

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CHARLES R. NORGLÉ  
United States District Judge

Dated: July \_\_, 2019