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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, and STATE OF NEW YORK, *Plaintiffs,* v. TWIN AMERICA, LLC, et al. *Defendants.*	Civil Action No. 12-cv-8989 (ALC) (GWG) ECF Case

~~[PROPOSED]~~ SCHEDULING ORDER

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Section I of the Standing Order for the Pilot Project Regarding Case Management Techniques for Complex Civil Cases in the Southern District of New York, and in accordance with the Initial Pretrial Conference conducted in the above-captioned action on March 8, 2013, the Parties hereby propose the following schedule to govern pretrial proceedings in the above-captioned action:

Joint Initial Report and Joint Electronic Discovery Submission No. 1 and [Proposed] Order ("ESI Order") filed	March 1, 2013
Initial Pretrial Conference	March 8, 2013
Fact Discovery	
Start of fact discovery	March 13, 2013

Initial disclosures served as detailed in Section 2(a) of the Joint Initial Report	March 15, 2013
Investigation Materials produced as detailed in Section 2(b) of the Joint Initial Report	Seven days following the end of the period for making confidentiality designations pursuant to Section B(3) of the Stipulated Protective Order
Meet-and-confer process on document collection and production	As outlined in the Joint Electronic Discovery Submission No. 1, ordered by the Court on March 8, 2013
Close of fact discovery	November 29, 2013
Preliminary trial witness lists due	November 29, 2013
Joint Preliminary Trial Report	December 13, 2013
Case Management Conference	To be set by the Court the week of January 6, 2014
Expert Discovery	
Parties to identify experts and testimony subject matter	November 22, 2013
Plaintiffs' opening expert reports served	December 20, 2013
Defendants' opening expert reports served	January 10, 2014
Plaintiffs' rebuttal expert reports served	January 31, 2014
Expert depositions	February 7-14, 2014
Close of expert discovery	February 14, 2014
Pre-Trial Motions	
Summary Judgment and *Daubert* motions filed (if any)	March 17, 2014
Summary Judgment and *Daubert* opposition briefs filed	April 16, 2014

Summary Judgment and *Daubert* reply briefs filed	April 30, 2014
Joint Final Pretrial Report	April 11, 2014 if no summary judgment motion filed; if summary judgment motion(s) filed, 28 days following the Court's resolution of the motion(s)
Motions *in limine* filed	April 11, 2014 if no summary judgment motion filed; if summary judgment motion(s) filed, 28 days following the Court's resolution of the motion(s)
Oppositions to motions *in limine* filed	April 18, 2014 if no summary judgment motion filed; if summary judgment motion(s) filed, 35 days following the Court's resolution of the motion(s)
Trial-Ready Date	May 9, 2014 if no summary judgment motion filed; if summary judgment motion(s) filed, 60 days after the Court's resolution of the motion(s)

AGREED TO:
Dated: March 13, 2013

By: William H. Stallings

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For Coach USA, Inc. and International Bus Services, Inc.

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For Twin America, LLC, CitySights LLC and City Sights Twin, LLC

SO ORDERED: _____, 2013

_____
JUDGE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE

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