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] AMENDED 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 October 2, 2013 Order Granting Plaintiff United States's Unopposed Motion for Stay in Light of Lapse of Federal Appropriations, the Parties hereby propose the following amended schedule to govern pretrial proceedings in the above-captioned action:

Close of fact discovery	January 3, 2014
Preliminary trial witness lists due	January 3, 2014
Joint Preliminary Trial Report	January 13, 2014
Case Management Conference	To be set by the Court the week of January 27, 2014
Expert Discovery	
Parties to identify experts and testimony subject matter	December 16, 2013

Plaintiffs' opening expert reports served	January 21, 2014
Defendants' opening expert reports served	February 10, 2014
Plaintiffs' rebuttal expert reports served	March 3, 2014
Expert depositions	March 10-14, 2014
Close of expert discovery	March 14, 2014
Pre-Trial Motions	
Summary Judgment and *Daubert* motions filed (if any)	April 11, 2014
Summary Judgment and *Daubert* opposition briefs filed	May 9, 2014
Summary Judgment and *Daubert* reply briefs filed	May 23, 2014
Joint Final Pretrial Report	April 30, 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 30, 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	May 7, 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 28, 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: October 18, 2014

/s

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

SO ORDERED: _____, 2013

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JUDGE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE