

*United States v. Assa Abloy, et. al.* 1:22-cv-02791 (ABJ)

Revised CMO Schedule

January 26, 2023

Event	Proposed Date
<b><u>Fact Discovery Schedule</u></b>	
Fact discovery begins	October 14, 2022
Answers to Complaint due	October 14, 2022
Parties produce Investigation Materials	October 17, 2022
Parties exchange preliminary trial witness lists (excluding experts)	November 15, 2022
Deadline for Production of Remedy Information in Paragraph 24	December 1, 2022
Close of <del>fact non-divestiture</del> discovery ( <u>except for all previously noticed fact depositions</u> )	February 10, 2023
Parties exchange <del>final</del> <u>revised</u> trial witness lists (including experts)	February <del>10</del> <u>17</u> , 2023
Close of <del>supplemental</del> <u>divestiture related</u> fact discovery	March 10, 2023
<u>Deadline for Parties to serve final witness lists (addition of new witnesses limited to persons previously deposed)</u>	<u>March 10, 2023</u>
<b><u>Expert Discovery Schedule</u></b>	
Plaintiff to serve any initial expert reports	February 10, 2023 (backup materials 2 business days later)
Defendants to serve any rebuttal reports	March 3, 2023 (backup materials 2 business days later)
Plaintiff to serve any reply reports	March 24, 2023 (backup materials included)
Copies of expert reports and backup materials exchanged between the parties delivered to Court	March 24, 2023

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Event	Proposed Date
Expert Depositions	Before April 7, 2023
<b><u>Pre-Trial Schedule</u></b>	
Parties exchange exhibit lists and opening deposition designations <u>(for any fact depositions taken after February 24, exchange of designations due 7 days after receipt of final transcript)</u>	<del>February 17</del> <u>March 3</u> , 2023
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 the Party pursuant to paragraph 37 of the Protective Order	<del>February 24</del> <u>March 8</u> , 2023
Exchange of objections to exhibit list, objections to deposition designations, and/or counters to deposition designations	March <del>3</del> <u>10</u> , 2023
Non-parties provide notice of any objections to the potential public disclosure at trial of any non-Party documents and depositions, including the basis for any such objections, and propose redactions where possible	March <del>9</del> <u>17</u> , 2023
Each side exchanges its objections to the other side's deposition counter-designations	March <del>9</del> <u>17</u> , 2023
Pre-trial briefs to be filed	<del>March 10</del> <u>January 18</u> , 2023
Parties meet and confer regarding disputes about trial exhibits and depositions designations, including confidentiality of any Party and non-Party documents or depositions	Week of March <del>13</del> <u>20</u> , 2023
Deadline for filing motions <i>in limine</i> and motions pursuant to <i>Daubert</i> or Fed. R. Evid. 703	March 17, 2023
Joint Party Submission to Court regarding deposition designations	March <del>17</del> <u>24</u> , 2023
Joint Party Submission to Court of exhibit lists and opposing parties' objections and the grounds therefor	March 24, 2023

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<b>Event</b>	<b>Proposed Date</b>
Parties submit final trial exhibits to Court	March 27, 2023
Responses to any motions <i>in limine</i> and motions pursuant to <i>Daubert</i> or Fed. R. Evid. 703	March 31, 2023
Final pre-trial conference	April 11, 2023
Trial begins	April 17, 2023
Post-trial briefs and proposed findings of fact and conclusions of law to be filed	2 weeks after trial concludes