

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA, et al.

Plaintiffs,

v.

UNITEDHEALTH GROUP INCORPORATED,
ET AL.,

Defendants.

Case No: 1:24-cv-3267

Judge James K. Bredar

REVISED PROPOSED SCHEDULE

In accordance with the Court’s order, ECF 108, Plaintiff United States of America, on behalf of all Parties, hereby submits this jointly revised, proposed schedule. The Parties conducted a meet-and-confer earlier today to discuss the proposed interim dates, assuming an October 27, 2025, trial. At the conclusion of the meet-and-confer, the Parties were unable to resolve their disputes concerning two dates: (1) exchange of initial fact witness lists, and (2) submission of post-trial briefs, proposed findings of fact and conclusions of law. The disputed entries and the Parties’ respective positions appear in bold in the schedule below.

The Parties also discussed the anticipated length of trial. The Plaintiffs stated that they estimate 15 trial days. The Defendants stated that they estimate 8–10 trial days.

Event	Plaintiffs’ Proposed Date	Defendants’ Proposed Date
Fact Discovery		
Deadline for Defendants to identify bidders in the divestiture process and to identify all currently contemplated	2/21/25	2/21/25

assets in the divestiture package being offered to those bidders		
Deadline for Defendants to identify divestiture buyer(s) and defendants' witnesses from divestiture buyer(s)	3/31/25	03/31/25
Parties exchange preliminary fact witness lists	4/17/25	02/24/25
Deadline for Defendants to produce final divestiture agreements	5/1/25	05/01/25
Dispositive or partially dispositive motions (if any) due on or before (opposition briefs due 3 weeks after any such filing)	5/19/25	05/19/25
Close of fact discovery	7/15/25	07/15/25
Parties exchange supplemental fact witness lists	7/16/25	07/16/25
Close of supplemental fact discovery	9/12/25	9/12/25
Parties exchange final fact witness lists	9/15/25	9/15/25
Expert Discovery		
Plaintiffs to serve any Initial Expert(s) Reports(s)	8/4/25	08/04/25
Deadline to produce Backup Materials for Plaintiffs' Initial Expert(s) Report(s)	8/5/25	08/05/25
Defendants to serve any Expert(s) Report(s)	9/3/25	09/03/25
Deadline to produce Backup Materials for Defendants' Opposition Expert(s) Report(s)	9/4/25	09/04/25
Plaintiffs to serve any Reply Expert(s) Reports(s)	9/29/25	09/29/25
Deadline to produce Backup Materials for Plaintiffs' Reply Expert(s) Report(s)	9/30/25	09/30/25
Close of Expert Discovery	10/7/25	10/7/25
Pre-Trial & Trial Procedures		
Parties exchange initial exhibit lists	8/27/25	08/27/25
Parties exchange initial deposition designations	8/29/25	08/29/25
Each Party informs each non-Party of all documents produced by that non-Party that are on the Party's exhibit	9/2/25	09/02/25

list and all depositions of that non-Party that have been designated by the Party pursuant to paragraph 29 of the Protective Order, ECF No. 40		
Each Side exchanges its objections to the other Side's initial exhibit list, including confidentiality objections	9/5/25	09/05/25
Each Side exchanges its objections to the other Side's initial deposition designations and provides its deposition counter-designations	9/8/25	09/08/25
Each Side exchanges its counter-counter-designations to any deposition designations	9/15/25	09/15/25
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	9/15/25	09/15/25
Parties meet and confer regarding admissibility of trial exhibits and deposition designations	9/22/25	09/22/25
Parties meet and confer regarding disputes about confidentiality of Party documents on trial exhibit list	9/24/25	09/24/25
Parties and non-Parties meet and confer regarding confidentiality of non-Party documents on trial exhibit list and non-Party depositions	9/29/25	09/29/25
Parties exchange any further additions to exhibit lists, limited to materials contained in any expert report	10/1/25	10/01/25
Joint Party Submission to Court of exhibit lists and, deposition designations, and opposing Parties' objections and the grounds therefor	10/3/25	10/03/25
Motions <i>in limine</i> and motions pursuant to <i>Daubert</i> or Fed. R. Evid. 703	10/3/25	10/03/25
Opposition to motions <i>in limine</i> and motions pursuant to <i>Daubert</i> or Fed. R. Evid. 703	10/10/25	10/10/25
Pretrial briefs	10/15/25	10/15/25
Final pre-trial conference	10/20/25	10/20/25

Trial begins	10/27/25	10/27/25
Post-trial briefs and proposed findings of fact and conclusions of law to be filed	12/15/25	Parties will confer in good faith and propose to the Court, in the proposed pretrial order, a recommendation for timing and length of post-trial briefing

**This schedule is not intended to waive any rights with respect to Amedisys's Motion to Temporarily Stay Count II, including Plaintiff United States's rights to oppose.*

Respectfully submitted on behalf of the Parties,

/s/ Erin K. Murdock-Park
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CERTIFICATE OF SERVICE

I hereby certify that I filed a copy of the foregoing on the Court's CM/ECF system in the above-captioned matter. It will provide notification of the filing to all registered participants.

/s/ Paul Torzilli
Paul Torzilli