

# **Exhibit A**

**Exhibit A****Proposed Schedule**

<b>Event</b>	<b>Parties' Agreed Upon Schedule If Court Orders <u>July 22</u> Hearing Date</b>	<b>Parties' Agreed Upon Schedule If Court Orders <u>August 7</u> Hearing Date</b>
Deadline to Serve Requests for Production	Monday, April 22, 2024	Monday, April 22, 2024
Deadline to Serve Responses and Objections to Requests for Production	Monday, May 6, 2024	Friday, May 17, 2024
Deadline for Substantial Completion of Production of Documents	Wednesday, May 22, 2024	Friday, June 7, 2024
Parties Serve Preliminary Fact Witness Lists	Friday, May 24, 2024	Monday, June 10, 2024
Close of Fact Discovery	Friday, June 14, 2024	Friday, June 28, 2024
Defendants to Serve Expert Rebuttal Reports	Tuesday, June 25, 2024	Wednesday, July 10, 2024
Plaintiffs to Serve Expert Reply Reports	Monday, July 1, 2024	Wednesday, July 17, 2024
Close of Expert Discovery		
Defendants' Response to Plaintiffs' Motion for Preliminary Injunction	Friday, July 12, 2024	Friday, July 26, 2024
File and Exchange of Final Fact Witness Lists		
File and Exchange of Exhibit Lists	Monday, July 15, 2024	Monday, July 29, 2024
Fubo's Reply in Support of Motion for Preliminary Injunction	Thursday, July 18, 2024	Thursday, August 1, 2024
Preliminary Injunction Hearing	Monday, July 22, 2024 – Wednesday, July 24, 2024	Wednesday, August 7, 2024 – Friday, August 9, 2024

**Exhibit A****Proposals for Limits on Discovery Devices**

<b>Discovery Device</b>	<b>Fubo's Proposal</b>	<b>Defendants' Proposal</b>
Requests for Production	The parties agree that each party should be permitted to serve requests for production.	
Interrogatories	Each party <sup>1</sup> should be permitted to serve up to 5 interrogatories on each other party. The parties should meet and confer regarding deadlines for serving and responding to these interrogatories.	Not ripe
Party Depositions	Each party should be permitted to take up to 5 depositions of each other party (or individuals under its control).	Not ripe
Requests for Admission	The parties agree that no requests for admission should be permitted.	
Third-Party Discovery	The parties agree that each party should be permitted to serve third-party subpoenas.	

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<sup>1</sup> For purposes of Fubo's proposal regarding depositions and interrogatories, Plaintiffs fuboTV Inc. and fuboTV Media Inc. will be treated as a single party, and Defendants The Walt Disney Company, ESPN, Inc., ESPN Enterprises, Inc., and Hulu, LLC will be treated as a single party.