

Exhibit A – Plaintiffs’ Proposed Case Schedule

Event	Plaintiffs’ Proposed Date
Plaintiffs to file first amended complaint, which will identify all copyrighted works	5 days after Court’s entry of scheduling order which will include identification of copyrighted works; preliminary list of infringements to be done per dates below, first as discovery based on plaintiff’s position at time of disclosure, with final list following Defendants’ use of Content ID to identify “matches” for copyrighted works with such final list to be deemed incorporated into the Complaint at that time.
Plaintiffs to identify preliminary list of infringements of copyrighted works (alleged infringements identified without Content ID)	14 days after Court’s entry of scheduling order
Plaintiffs to serve Rule 26 initial disclosures for new parties.	30 days after filing of amended complaint
Defendants’ answer or motion to dismiss	21 days after filing of amended complaint
Plaintiffs’ opposition to motion to dismiss amended complaint, if any	28 days after motion to dismiss, if any
Defendants’ reply brief in support of motion to dismiss, if any.	14 days after deadline for Plaintiffs’ opposition to the motion to dismiss
Plaintiffs identify final combined list of alleged infringements for purposes of this case, which infringements are deemed to be amended into the operative complaint	The later of January 21, 2022 or 60 days after Defendants disclose all Content ID matches for the copyrighted works contained in the amended complaint
Deadline for substantial completion of rolling document productions	March 4, 2022
Deadline for motion for class certification/opening class cert expert reports due	July 21, 2022
Opposition to class certification/rebuttal class cert expert reports due	August 25, 2022
Deadline for deposing Defendants’ class cert experts/close of fact discovery for class certification only	September 22, 2022
Deadline for reply in support of motion for class certification	September 29, 2022

Event	Plaintiffs' Proposed Date
Hearing on motion for class certification	October 13, 2022 or first Thursday at least 14 days after previous event (or per Court's availability)
Close of fact discovery	Later of January 9, 2023 or 60 days following class certification decision
Disclosure of proposed expert or other opinion witnesses	Later of January 16, 2023 or 7 days following previous event
Opening merits expert reports due	Same as previous event
Rebuttal merits expert reports due	Later of February 20, 2023 or 35 days following previous event
Close of merits expert discovery	Later of March 20, 2023 or 28 days following previous event
Deadline to move for summary judgment	Later of April 10, 2023 or 21 days following previous event
Opposition to motions for summary judgment	Later of May 8, 2023 or 28 days following previous event
Reply in support of motions for summary judgment	Later of May 30, 2023 or 21 days following previous event
Hearing on motions for summary judgment	Later of June 15, 2023 or first Thursday at least 14 days after previous event (or per Court's availability)
Serving and filing briefs on all significant disputed issues of law, including procedural and evidentiary issues (motions <i>in limine</i> , Daubert motions)	Later of August 14, 2023 or 30 days following decision on motion(s) for summary judgment
Counsel to meet and confer to prepare joint final pretrial conference statement and proposed order and coordinated submission of trial exhibits and other material	Later of August 21, 2023 or 7 days following previous event
Filing joint final pretrial conference statement and proposed order, serving and filing requested voir dire questions, jury instructions, and forms of verdict	Later of September 5, 2023 or 14 days following previous event
Final pretrial conference	Later of September 14, 2023 or first Thursday at least 7 days following previous event (or per Court's availability)

Event	Plaintiffs' Proposed Date
Lodging exhibits and other trial material, including copies of all exhibits to be offered and all schedules, summaries, diagrams and charts to be used at the trial other than for impeachment or rebuttal. Each proposed exhibit must be premarked for identification. Upon request, a party must make the original or the underlying documents of any exhibit available for inspection and copying	Later of September 21, 2023 or 7 days following previous event
Serving and filing statements designating excerpts from depositions (specifying the witness and page and line references), from interrogatory answers and from responses to requests for admission to be offered at the trial other than for impeachment or rebuttal	Later of September 21, 2023 or 7 days following final pretrial conference
Trial	Later of October 12, 2023 or 21 days following final pretrial conference