

Defendants' September 2021 Schedule Proposal

Event	Date
Deadline to file amended pleadings	Plaintiff Schneider and Proposed Plaintiffs AST and Uniglobe shall file the amended complaint within 5 days of the Court's order entering this schedule, which shall include a final identification of all works in suit and preliminary identification by URL of all allegedly infringing videos known to Plaintiffs as of this date
Deadline for new plaintiffs to serve Rule 26 initial disclosures	10 days after filing of amended complaint
Deadline for defendants' response to amended complaint	28 days after filing of amended complaint
Deadline for Plaintiffs to serve final identification by URL of any additional videos that they allege infringe the pleaded works in suit in this action, which infringements are deemed to be amended into the operative complaint	January 21, 2022
Deadline for Plaintiffs to file motion for class certification	January 27, 2022
Deadline for Defendants to file opposition to Plaintiffs' motion for class certification	March 10, 2022
Deadline for Plaintiffs to file reply in support of motion for class certification	March 31, 2022
Hearing on Plaintiffs' motion for class certification	TBD based on Court's availability
Close of fact discovery	July 22, 2022
Disclosure of proposed expert or other opinion witnesses	July 29, 2022
Opening expert reports due	August 12, 2022
Rebuttal expert reports due	September 16, 2022
Close of expert discovery	October 14, 2022
Deadline to move for summary judgment	November 11, 2022
Deadline to file opposition to motion for summary judgment	December 16, 2022

Deadline to file reply in support of motion for summary judgment	January 19, 2023
Hearing on motion(s) for summary judgment	TBD based on 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)	April 10, 2023
Counsel to meet and confer to prepare joint final pretrial conference statement and proposed order and coordinated submission of trial exhibits and other material	April 17, 2023
Filing joint final pretrial conference statement and proposed order	May 1, 2023
Serving and filing requested voir dire questions, jury instructions, and forms of verdict	May 1, 2023
Final pretrial conference	May 8, 2023
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	May 15, 2023
Serving and filing statements designating excerpts from depositions (specifying the witness and page and line	May 15, 2023

references), from interrogatory answers and from responses to requests for admission to be offered at the trial other than for impeachment or rebuttal	
Trial	May 29, 2023