

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**PROPOSED DISCOVERY AND CASE MANAGEMENT DEADLINES AND
REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER**

The Parties, through their respective counsel, propose the following discovery and case management deadlines and request that the Court enter an order modifying its Order filed October 30, 2015, ECF #13, for the following reasons:

The parties have been actively engaged in completing fact discovery in this case. On June 23, 2016 the Court extended the time to complete non-expert fact discovery to July 29, 2016. At that time the Court recognized that the extension of fact discovery depositions would impact other deadlines in the case and directed that the parties confer regarding a proposed modified scheduling order.

Various discovery motions are pending and it is unlikely that those motions will be resolved before the close of fact discovery. In addition, it is anticipated that certain depositions may need to be scheduled after July 29, 2016 to accommodate the schedules of counsel and the witnesses. The parties anticipate that there will be a number of legal issues that will need to be addressed prior to trial.

Accordingly, in an attempt to fashion a schedule that allows the parties and the Court to efficiently manage outstanding discovery and legal issues the parties propose the following schedule:

Pursuant to this Court's Order of June 23, 2016, the parties have conferred and, subject to the Court's approval and availability propose the following schedule:

The tentative jury trial scheduled for October 17, 2016 be rescheduled to begin on December 12, 2016;

Fact depositions shall be completed by July 29, 2016 unless otherwise agreed to by the parties or for good cause shown;

Expert Disclosures per 26(a)(2)(A) and (B) shall be made by August 31, 2016;

Expert Disclosures per 26(a)(2)(D) shall be made by September 30, 2016;

Expert depositions shall be concluded by October 14, 2016;

Dispositive Motions and 702 Motions shall be filed by October 28, 2016;

Initial designation of deposition testimony to be used at trial shall be made by November 10, 2016;

Objections to deposition designations shall be filed by November 21, 2016;

Counter-designations to initial deposition designations shall be made by November 21, 2016;

Motions in Limine/other motions shall be filed by November 21, 2016;

The Joint Pre-trial Order shall be submitted by November 21, 2016;

Objections to any counter-designations shall be made by November 30, 2016;

Proposed agreed upon/disputed Jury Instructions and Verdict forms shall be submitted by November 30, 2016;

Proposed jury questions shall be submitted by November 30, 2016.

WHEREFORE, the parties request that the Court adopt the proposed schedule and modify the Court's Order of October 30, 2015 to reflect the above deadlines.

Dated: July 25, 2016

Respectfully submitted,

/s/ Bradley J. Edwards

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CERTIFICATE OF SERVICE

I certify that on July 25, 2016, I electronically served this *PROPOSED DISCOVERY AND CASE MANAGEMENT DEADLINES AND REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER* via ECF on the following:

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