

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DATA MARKETING PARTNERSHIP, LP,)	
ET AL.,)	
)	
Plaintiffs,)	
)	Civil Action No. 4:19-cv-00800-O
v.)	
)	
UNITED STATES DEPARTMENT OF)	
LABOR, ET AL.,)	
)	
Defendants.)	

JOINT STATUS REPORT AND MOTION FOR EXTENSION OF DEADLINES

On April 23, 2026, lead counsel for the parties conferred via telephone in accordance with this Court’s order. (ECF No. 98). The parties were able to reach an agreement as to the outstanding documents to be produced in this case.

Pursuant to Federal Rule of Civil Procedure 34, Plaintiffs agree to produce the documents in their possession, custody, and control, to include the following identified documents by May 8, 2026:¹

Document	Referenced In	Responsive To
All source documents for DMP tax returns, including bank statements, payroll records, credit card statements, and records of payments relating to health plan	Lazarou Tr. 32:14-33:23	RFPs 30, 33
All source documents for DMP balance sheet and income statement, including bank statements, payroll records, credit card statements, records of payments relating to health plan, and profit and loss statements	Lazarou Tr. 96:5-97:3; 99:11-24; 100:8-9	RFPs 33
The Legends data procured by Rochester and given to Lazarou	Lazarou Tr. 38:2-16	RFPs 6, 7, 18, 19, 23
Emails from Lazarou to Rochester (including emails sent during 2025-2026)	Lazarou Tr. 38:2-16	RFP 7

¹ See the Chart of Identified Missing Documents in Defendants’ Memorandum in Support of the Motion to Compel (ECF No. 94, at 5-6).

LPMS operating agreement signed by Lazarou	Lazarou Tr. 111:23-112:1	RFP 13
Communications between Johnson and Lazarou related to DMP and verifying Adam Rochester's work hours	Lazarou 39:14-42:6	RFP 7
Documents and communications reflecting sale of LPMS limited partnerships' data to Distributed Data, including contract entered into on or about July 2025, records of payments from Distributed Data	Lazarou Tr. 54:7-65:19	RFPs 4, 6, 7, 25, 33
Emails from Lazarou to Analytics 8 reflecting transmission of data	Lazarou Tr. 55:3-56:7	RFPs 6, 23, 25, 26, 33
Data files sent by Lazarou to Analytics 8	Lazarou Tr. 55:3-56:7	RFPs 6, 18, 19, 23, 26
Data sent to Lazarou from Suffolk	Lazarou Tr. 80: 17-81:21	RFPs 6, 18, 19, 23, 26
Emails from Suffolk to Lazarou relating to sent data (including communications with Juan [last name unknown] about data)	Lazarou 140:21-141:4	RFPs 6, 26
Data files provided to Distributed Data (including those referenced in Lazarou's deposition testimony as occurring in March 2026 and weekly following first transmission of data)	Lazarou Tr. 67:7-13	RFPs 6, 18, 19, 23, 26
Wire records to third party administrators of DMP plan reflecting DMP premium payments	Lazarou Tr. 91:5-93:12	RFPs 10, 11
Bank statements from Wells Fargo account (opened in or about 2023 or 2024)	Lazarou Tr. 93:3-16	RFP 33
Bank statements from Chase account (that was open prior to Wells Fargo account)	Lazarou Tr. 93:3-16	RFP 33
Documents relating to loan used to fund DMP's business expenses (including loan agreement, invoices, payments, and payment confirmation)	Lazarou Tr. 108:12-112:1	RFPs 7, 13, 33
Statements and/or invoices submitted to Keith Berglund, Esq.	Lazarou Tr. 108:12-112:1	RFPs 7, 13, 33
Spreadsheets provided by Suffolk for use in preparing Form 5500s	Lazarou Tr. 163:18-165:18	RFPs 10, 33
Emails from Suffolk with invoices relating to health plan	Lazarou Tr. 167:5-168:10; 182:19-183:12	RFPs 10,11, 33
Responsive emails from steve.lazarou@lpmgmtservices.net , stevelaz@comcast.net , zeusbiz@comcast.net , laz@zbizcpa.com , or laz@zbizcpa.net	Lazarou Tr. 182:6-18	RFPs 7, 13, 34
Group chats between Rochester, Johnson, and W-2 employees of other LPMS limited partnerships	Johnson Tr. 104:11-24; 106:1-23	RFPs 7, 34
Documents relating to UDMC loan, including	Johnson 111:5-114:4	RFPs 13, 15, 33

invoices submitted by Johnson	117:7-19; 140:3-7	
Group text related to meeting of DMP limited partners at La Madeleine	Rochester Tr. 24:21-25:22	RFPs 7, 28, 34
Communications between Rochester and Renfro	Rochester 45:6-46:2; 86:7-19	RFPs 7, 34
Texts from Rochester to DMP limited partners relating to EASE app	Rochester Tr. 67:25-68:14	RFPs 7, 26, 34
2025 W-2 for Adam Rochester	Rochester Tr. 77:7-78:5	RFP 32
Communications between Lazarou and Rochester relating to DMP (including email requesting limited partners' Venmos)	Rochester Tr. 108:24-109:13	RFPs 7, 10, 11, 34
Records of payments to Limited Partners	Fiedler Tr. 31:21-32:7	RFPs 10, 11
Meeting invitations / Meeting minutes relating to LP meetings	Fiedler Tr. 66:12-67:1	RFP 28
2019 Membership Packet	Fiedler Tr. 51:5-15; 66:12-67:1	RFP 1

JOINT MOTION FOR EXTENSION OF DEADLINES

The parties additionally jointly move for an extension of the discovery period of 45 days from the date Plaintiffs produce the responsive documents on May 8, 2026 so that the Parties may be afforded a limited window of opportunity to conduct additional discovery on those documents, if necessary. The Parties additionally seek a 45-day extension of all other deadlines listed in the Court's December 29, 2025 scheduling order. (ECF No. 87).

Dated: April 24, 2026

Respectfully submitted,

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/s/ Katie Carr Jacobs
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April 24, 2026

Via ECF Filing

Hon. Hal R. Ray
501 West 10th St.
Room 202A
Fort Worth, Texas 76102

Re: *Data Marketing Partnership v. U.S. Department of Labor, et al.*, No. 4:19-cv-800-O (ECF No. 99)

Dear Judge Ray,

This letter serves as a transmittal letter as required by ECF No. 97 wherein consideration of Defendants' Motion to Compel Discovery Responses and Motion for Expedited Hearing and Briefing Schedule has been referred for consideration to your docket. In addition to the Joint Status Report and Motion for Extension of Deadlines, the Parties submit an order on the joint motion.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Katie Carr Jacobs
Katie Carr Jacobs

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FORT WORTH DIVISION**

DATA MARKETING PARTNERSHIP, LP, Plaintiff,)	
)	
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v.)	Civil Action No. 4:19-cv-00800-O
)	
)	
UNITED STATES DEPARTMENT OF LABOR, et al., Defendants.)	
)	

ORDER

Before this Court is the parties' Joint Status Report and Motion for Extension of All Deadlines. ECF No. ___. The Court finds good cause to **GRANT** the Motion.

Accordingly, the Court **ORDERS** as follows:

1. Plaintiff **SHALL** produce the documents identified in ECF No. ___ by **May 8, 2026**.
2. The fact discovery period **SHALL** be extended to **June 22, 2026**.
3. Plaintiffs **SHALL** file a motion for summary judgment on **June 29, 2026**.
4. Defendants **SHALL** file their opposition to Plaintiffs' motion for summary judgment consolidated with Defendants' cross-motion for summary judgment by **August 14, 2026**.
5. Plaintiffs **SHALL** file their reply brief in support of their motion for summary judgment consolidated with their opposition to Defendants' cross-motion for summary judgment by **August 28, 2026**.

6. Defendants **SHALL** file their reply in support of their cross-motion for summary judgment by **October 13, 2026**.

SO ORDERED this ___ day of **April, 2026**.

Reed O'Connor
CHIEF UNITED STATES DISTRICT JUDGE