

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division: Montgomery County)**

AMERICAN ASSOCIATION OF
PHYSICIANS FOR HUMAN RIGHTS, INC.
d/b/a GLMA: HEALTH PROFESSIONALS
ADVANCING LGBTQ+ EQUALITY; *et al.*,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH;
et al.,

Defendants.

Civil Action No. 8:25-cv-01620-LKG

**JOINT STATUS REPORT REGARDING SCHEDULING
AND FURTHER PROCEEDINGS**

Pursuant to this Court's September 12, 2025 Order (Dkt. 99), Plaintiffs American Association of Physicians for Human Rights, Inc. d/b/a GLMA: Health Professionals Advancing LGBTQ+ Equality, *et al.*, and Defendants National Institutes of Health, *et al.*, have met and conferred regarding any further proceedings and have agreed on a proposed schedule.

The parties respectfully request that the Court enter the attached Proposed Scheduling Order. Consistent with the parties' understanding of local practice, the parties propose to submit a joint status report at the conclusion of discovery to address scheduling and further proceedings with regards to any dispositive motions.

A proposed scheduling order is attached hereto.

Dated: September 26, 2025

Respectfully submitted,

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[PROPOSED] SCHEDULING ORDER

The Court, with the consent of the Parties, enters the following schedule for pre-trial proceedings:

Deadline for Defendants to Answer Complaint	October 31, 2025
Deadline for Defendants to Submit Administrative Record	November 14, 2025
Deadline to Exchange Initial Disclosures	November 14, 2025
Deadline to Amend the Pleadings	January 15, 2026
Deadline to Join Additional Parties	January 15, 2026
Plaintiffs' Rule 26(a)(2) Expert Disclosures	January 21, 2026
Defendants' Rule 26(a)(2) Expert Disclosures	March 9, 2026
Plaintiffs' Rule 26(a)(2) Expert Rebuttal Disclosures	March 27, 2026
End of Discovery	April 30, 2026
Post-Discovery Joint Status Report	May 5, 2026

1. Post-Discovery Joint Status Report

At the close of discovery, the parties shall file a joint status report covering the following the matters: (a) Whether discovery has been completed; (b) Whether any motions are pending; (c) Whether any party intends to file a dispositive pretrial motion; (d) Whether the case is to be a jury trial or a non-jury trial and the anticipated length of trial; and (e) Any other matter that the parties believe should be brought to the Court's attention.

2. Discovery Requests and Depositions

Absent agreement of the parties or Order of the Court to the contrary, the parties shall abide by the limits on the number of Requests for Production, Requests for Admission, Interrogatories, and Depositions set forth in Local Rule 104 and the Federal Rules of Civil Procedure, except that such limitations shall apply per side, rather than per party.

3. Confidentiality

If the parties seek to limit disclosure of confidential information, any proposed protective order must be submitted to the Court for approval and must be consistent with Local Rule 104.13 and Local Rule 105.11. The parties will submit a proposed protective order for the Court's approval.

IT IS SO ORDERED.

Date: _____

LYDIA KAY GRIGGSBY
United States District Judge