

Chief District Judge Denise J. Casper: ORDER entered. Having had a chance to consider the parties' joint statement, D. 161 , and the respective positions of counsel as articulated in that statement and at yesterday's scheduling conference, the Court ORDERS as follows:

The Discovery/Summary Judgment schedule shall be:

Initial Disclosure under Rule 26(a)(1)(i) May 21, 2026

Initial Disclosure under Rule 26(a)(1)(ii)-(iv) June 5, 2026

Deadline for seeking Leave to Amend June 19, 2026

Deadline to Assert Advice of Counsel defense July 30, 2026

Deadline to Assert Advice of Counsel defense, Deliberative Process, Investigatory Files or Official Privileges November 30, 2026

Close of Fact Discovery May 26, 2027

Designation of Experts/Disclosure of Expert Reports (simultaneous exchange) August 9, 2027

Responsive Expert Reports (simultaneous exchange) October 8, 2027

Rebuttal Reports November 5, 2027

Close of Expert Discovery January 5, 2028

Deadline for filing Dispositive Motions March 6, 2028

Opposition to Dispositive Motions May 5, 2028

Replies to Dispositive Motions June 5, 2028

As to a cap on discovery events, the Court recognizes that, in some respects, the presumptive limitations under the Local Rules are insufficient here. Still, some proportionality and reasonable limits are warranted. Accordingly, the Court ORDERS as follows:

Depositions: Each side may notice up to 15 depositions including any Rule 30(b)(6) deposition(s). The Court also agrees and adopts the parties' procedure, D. 161 at 6-7, as to any disputes as to deposition length.

Requests for Admissions/Interrogatories: The government may serve 8 common interrogatories and 8 common requests for admissions to Defendant Brokers (as defined in the Joint Statement, D. 161 at 7), collectively, and the same number to Defendant Insurers (as defined in the Joint Statement, D. 161 at 7-8), collectively and may serve up to 3

individual interrogatories and 3 individual requests for admission as to each Defendant.

Defendant Brokers, collectively, may serve 8 common interrogatories and 8 common requests for admission to the government. Defendant Insurers, collectively, may serve 8 common interrogatories and 8 common requests for admission to the government. Each Defendant, individually, may serve 3 individual interrogatories and 3 individual requests for admission on the government.

Requests for Production: The government may serve 2 sets of common requests for production, totaling up to 25 requests, to Defendant Brokers, collectively; and the same number to the Defendant Insurers, collectively, and may serve 1 separate set, of no more than 10 requests, to each Defendant.

Defendant Brokers, collectively, may serve 2 common sets of requests for production, totaling up to 25 requests, to the government. Defendant Insurers, collectively, may serve 2 common sets of requests for production, totaling up to 25 requests, to the government. Each Defendant, individually, may serve 1 separate set of requests for production, totaling up to 10 requests, to the government. (SEC)
(Entered: 05/27/2026)