

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 9:25-CV-80526-DMM

GOOD SAMARITAN MEDICAL CENTER,
INC., et al.,

Plaintiffs,

v.

THE LEAPFROG GROUP,

Defendant.

JOINT PROPOSED CASE SCHEDULE

In advance of the status conference scheduled for May 28, 2025, the parties have met and conferred and jointly propose the following schedule for this action:

Item	Date
Parties file ESI Protocol	June 13, 2025
TLG's Deadline to File MTD	June 6, 2025
Plaintiffs' Response to MTD	June 20, 2025
TLG's Reply ISO MTD	June 27, 2025
26(f) Conference	July 10, 2025
Parties Serve Initial Disclosures	July 17, 2025
Substantial Completion of Document Production	August 14, 2025
Non-Expert Discovery Cutoff	September 25, 2025
Opening Expert Report	October 2, 2025
Rebuttal Expert Reports	October 16, 2025

Close of Expert Discovery	November 12, 2025
Dispositive Motion Deadline	November 12, 2025
Pretrial Calendar Call	January 7, 2026
Trial	January 12, 2026

Dated: May 27, 2025

Respectfully submitted,

By: /s Michael Pineiro

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