

Warner and Watson Defendants’ privilege logs and production by four business days from the current deadline (Monday, May 28, 2018 is a holiday). This proposal would move the deadline for Plaintiffs to June 1, 2018. Plaintiffs have conferred with the Warner and Watson Defendants, who do not oppose this motion.

Below is the proposed case management amendment to be added to Case Management Order 11, as requested herein:

Event	Current Schedule	Unopposed Proposal
Deadline for Plaintiffs to file motions regarding privilege-related issues concerning Warner and Watson Defendants’ privilege logs and production. ¹	May 25, 2018	June 1, 2018

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and enter a new interim case management order extending the deadline to June 1, 2018 for Plaintiffs to file privilege-related motions concerning the Warner and Watson Defendants’ privilege logs and production.

Dated: May 25, 2018

Respectfully submitted,

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¹ Discovery motions may be filed before this date, but may only be filed after this date to address issues arising after the deadline or for good cause shown.

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of May, 2018, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). The foregoing document is also available for viewing and downloading from the ECF system.

/s/ Sharon K. Robertson
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