

– Exhibit A –

Joint Proposed Scheduling Order

*United States v. AT&T Inc. et al.*, No. 17-cv-02511-RJL

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

AT&T INC., DIRECTV GROUP  
HOLDINGS, LLC, and  
TIME WARNER INC.,

*Defendants.*

Case No. 1:17-cv-02511-RJL

**[PROPOSED] SCHEDULING ORDER**

This Court, having considered the motions of the parties for entry of their Proposed Scheduling Order, and having conducted a hearing on December 7, 2017, enters this Scheduling Order pursuant to Rule 16 of the Federal Rules of Civil Procedure, and LCvR 16.4:

<b>Event</b>	<b>Date</b>
Protective Order Entered	December 8, 2017
Fact Discovery Begins	Upon entry of Scheduling Order
Investigation Materials from Third Parties Production Begins On a Rolling Basis (Based on receipt of written statement from third party not objecting to disclosure)	Within 10 calendar days after Protective Order entered
Investigation Materials from Third Parties Production Completed (Except for any with unresolved objections to the Protective Order)	Within 17 calendar days after Protective Order entered
Parties exchange preliminary fact witness lists	Jan. 3, 2018
Parties exchange final fact witness lists	Feb. 2, 2018

Event	Date
Parties exchange initial expert reports on economic and efficiency and/or synergy issues, reserving the right to serve rebuttal reports pursuant to this Order for any new disclosure contained in the initial reports. (The parties have agreed that any party's agreement to serve their expert witness disclosures on economic issues, efficiencies and synergies as part of the initial expert reports shall not be used as a basis to argue that such party bears the burden of proof on economic issues, efficiencies and synergies.)	Feb. 2, 2018
Close of fact discovery	Feb. 16, 2018
Parties to Submit Proposed Trial Procedures Order	Feb. 16, 2018
Parties exchange rebuttal reports	Feb. 26, 2018
Close of Supplemental Discovery	Feb. 28, 2018
Close of expert discovery	Mar. 9, 2018
Pretrial motions and briefs (other than <i>Daubert</i> motions) to be filed	Mar. 9, 2018
<i>Daubert</i> motions to be filed	Mar. 12, 2018
Oppositions to pretrial motions to be filed	Mar. 13, 2018
Oppositions to <i>Daubert</i> motions to be filed	Mar. 15, 2018
Parties submit final trial exhibits to Court	Mar. 15, 2018
Final pretrial conference	To be determined by the Court
Trial Begins (anticipated 15 days)	Mar. 19, 2018
Parties submit Proposed Findings of Fact and Conclusions of Law	7 calendar days after trial ends

The terms set forth above are as defined in the Case Management Order, entered by the Court in this case.

**1. Calculation of Dates.** Unless otherwise specified, days shall be counted pursuant to Rule 6(a) of the Federal Rules of Civil Procedure.

**2. Modification of Scheduling Order.** This Order may be modified or amended by mutual agreement of the parties, provided that any such modification has no effect on the schedule for pretrial filings or trial dates. Otherwise, any party may seek modification of this Order for good cause.

3. **Motions for Extensions.** Parties seeking extensions of dates set out in this Order should seek them in a timely fashion, before the relevant deadline passes.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE