IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA, Plaintiff,))))
V.)
NORTHWEST AIRLINES CORP.,) Civil Action No.: 98-74611) Judge Denise Page Hood
and) Magistrate Judge Scheer
CONTINENTAL AIRLINES, INC.,)))
Defendants.)
)

PLAINTIFF'S UNOPPOSED MOTION FOR ENTRY OF A SECOND REVISED SCHEDULING ORDER

Plaintiff United States of America, by its attorneys, hereby respectfully requests that the Court enter a second revised scheduling order modifying the pretrial schedule governing this litigation. The proposed order simply extends the period for factual discovery by one month along with all subsequent deadlines in the Court's current scheduling order. As explained fully in the attached letter, this one month extension is necessary due to an unanticipated delay in the completion of a document imaging project jointly undertaken by plaintiff and Northwest.¹

Because of this delay, plaintiff will not have access to all of Northwest's responsive documents

¹Given that this motion is unopposed, plaintiff will not burden the Court with a lengthy discussion of the facts giving rise to the requested extension. The attached letter from counsel for plaintiff to counsel for Northwest sets forth this information in detail, and we are available to answer any other questions or appear before the Court upon request. <u>See</u> Exhibit A hereto.

until the middle of October. Without the proposed extension, plaintiff would thus be unable to conduct full and complete depositions of Northwest's executives as contemplated by the Court's existing scheduling order. Plaintiff has been authorized to state that defendants do not oppose this motion, but understand that defendant Northwest may file a separate response on an

expedited basis. A proposed order accompanies this motion.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES

"/s/"

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