

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

THE DISTRICT OF COLUMBIA and
THE STATE OF MARYLAND,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States of America, in his official and in his
individual capacity,

Defendants.

Civil Action No. 8:17-cv-01596-PJM

PROPOSED SCHEDULE OF DISCOVERY

Pursuant to this Court's Order dated November 2, 2018 (ECF No. 136), Plaintiffs submit the following proposed Schedule of Discovery, consistent with the Schedule set out in the earlier Joint Report made to the Court pursuant to Federal Rule of Civil Procedure 26(f) (ECF No. 132). Plaintiffs have adjusted the proposed discovery deadlines to provide approximately six months for fact discovery and two months for expert discovery, as contemplated by the parties' Joint Report.

I. Discovery Plan

A. Initial Disclosures

The parties agree that the disclosures required by Rule 26(a)(1)(A) need not be made until five business days after the Court enters the Scheduling Order.

B. Fact Discovery

Fact discovery will conclude 180 days after the Court enters a scheduling order, with all discovery requests to be served at least 30 days in advance such that the responses are due on or before the close of discovery.

C. Expert Discovery

Disclosures of expert witnesses will be due 190 days after the Court enters a scheduling order. Expert discovery will conclude 240 days after the Court enters a scheduling order.

Dated: November 21, 2018

Respectfully submitted,

THE STATE OF MARYLAND

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