UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Bureau of Consumer Financial Protection, and the Commonwealth of Massachusetts *ex rel.* Maura Healey, Attorney General, Plaintiffs, v. Commonwealth Equity Group, LLC (d/b/a Key Credit Repair) and Nikitas Tsoukalis (a/k/a Nikitas Tsoukales), Defendants.	Case No. 1:20-cv-10991-RWZ

Joint Status Report

Plaintiffs, the Bureau of Consumer Financial Protection and the Commonwealth of Massachusetts *ex rel.* Maura Healey, Attorney General and Defendants, Commonwealth Equity Group, LLC and Nikitas Tsoukalis (collectively "the Parties") submit the following Joint Status Report in response to this Court's November 10, 2022 directive (ECF No. 85):

1. Conferring of Parties

   The Parties certify that they conferred about this Joint Status Report by telephone on December 20, 2022.

2. Expert Witnesses

   Plaintiffs: Plaintiffs anticipate using one or two experts at trial. Defendants produced 6,639 additional documents to Plaintiffs on December 14, 2022, pursuant to the Court's November 15, 2022 order. Plaintiffs anticipate reviewing those documents and submitting all relevant documents to the experts for review by February 1, 2023.

   Defendants: Defendants anticipate using one or two experts at trial. Defendants anticipate

submitting all relevant documents to the expert(s) for review by February 1, 2023.

3. The parties agree to the following scheduling order, taking into account the Parties' need to review documents, accommodate experts' availability, prepare expert reports and rebuttals, and take or defend depositions of the experts.

Event	Proposed Date
Parties' Joint Status Report (set by the Court)	December 30, 2022
Expert Witness Disclosures	March 1, 2023
Rebuttal Expert Witness Disclosures	April 14, 2023
Expert Witness Discovery Deadline	May 12, 2023
Filing of Dispositive Motions	June 30, 2023
Trial	TBD

Respectfully submitted,

Dated: December 21, 2022

Bureau of Consumer Financial Protection

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