UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BLOCK & LEVITON LLP, Plaintiff, v. FEDERAL TRADE COMMISSION, Defendant.	Civil Action No. 19-12539

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to Local Rule 16.1(d), Plaintiff, Block & Leviton LLP ("Plaintiff"), and Defendant, the Federal Trade Commission (the "FTC," and, together with Plaintiff, the "Parties"), hereby submit the following joint statement:

Plaintiff instituted this action pursuant to the Freedom of Information Act ("FOIA") to obtain certain records from the FTC concerning the conduct described in *United States of America v. Facebook, Inc.*, No. 19-cv-2184 (D.D.C.), the related Cambridge Analytica inquiry, and the July 24, 2019 settlement related thereto. Plaintiff seeks to investigate whether, as part of its settlement with the FTC, Facebook agreed to pay a larger penalty than necessary to shield Mark Zuckerberg from personal liability.

I. Timetable For Discovery and Motion Practice

A. Fact Discovery

The Parties do not anticipate any need for fact discovery (beyond the production of the requested documents and the production of a *Vaughn* index).

B. Motion Practice

The Parties propose the following schedule:

Event	Deadline
Deadline for amendments to pleadings	February 17, 2020
Deadline for Defendant to file its motion for summary judgment and *Vaughn* index	April 10, 2020
Deadline for Plaintiff to file its opposition and any cross-motion for summary judgment	May 1, 2020
Deadline for Defendant to file its opposition to Plaintiff's motion for summary judgment	May 22, 2020

Motions and oppositions shall not exceed twenty (20) pages, excluding the separate, Local Rule 56.1 statements of undisputed fact. Any reply memoranda shall be governed by the Local Rules.

II. Obligations of Counsel to Confer

The Parties conferred regarding their obligations under Local Rule 16.1(b) at least twenty-one (21) days before the scheduling conference. Plaintiff served a written settlement proposal to the FTC more than fourteen (14) days before the date of the scheduling conference.

The Parties do not consent to trial by Magistrate Judge at this time.

III. Certification Pursuant to Local Rule 16.1

Certifications pursuant to Local Rule 16.1 will be filed separately.

Dated: February 10, 2020

__/s/_Jason M. Leviton_____
Jason M. Leviton (BBO # 678331)
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Counsel for the FTC

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys of record by action of the Court's ECF system on February 10, 2020.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom