UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BLOCK & LEVITON LLP,

Plaintiff,

v.

FEDERAL TRADE COMMISSION,

Defendant.

Civil Action No. 19-12539-PBS

JOINT STATEMENT REGARDING REVISED PROPOSED CASE SCHEDULE

Pursuant to the discussion that occurred during the Scheduling Conference on February 19, 2020, the parties submit the following revised, proposed case schedule.

Event	Original Proposed Deadline	Revised Proposed Deadline
Deadline for amendments to pleadings	February 17, 2020	February 17, 2020
Deadline for Defendant to produce first batch of documents to Plaintiff with accompanying *Vaughn* index	N/A	April 15, 2020[1]
Deadline for Defendant to file its motion for summary judgment and *Vaughn* index for remaining documents	April 10, 2020	May 15, 2020
Deadline for Plaintiff to file its opposition and any cross-motion for summary judgment	May 1, 2020	June 5, 2020

[1] Although a deadline of April 10, 2020 was discussed at the hearing, counsel for the FTC was unaware that two of the people handling the FOIA review for FTC are on vacation through that date. The parties therefore propose a modest extension.

Event	Original Proposed Deadline	Revised Proposed Deadline
Deadline for Defendant to file its opposition to Plaintiff's motion for summary judgment	May 22, 2020	June 26, 2020

Dated: February 21, 2020

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was filed via the Court's CM/ECF system on February 21, 2020, which will provide notice to all parties of record.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom