

Federal Rules of Civil Procedure, and (2) the United States shall file and serve the administrative record and index.

a. ***Fact Discovery.*** Fact discovery shall be completed by no later than **April 29, 2016.**

b. ***Expert Witness Discovery.*** Expert witness discovery shall be completed by no later than **September 16, 2016.**

i. ***Initial Expert Witness Reports.*** By no later than **May 20, 2016**, the parties shall submit the reports of expert witnesses whose testimony may be offered to support issues on which an offering party has the burden of proof.

ii. ***Responsive Expert Witness Reports.*** By no later than **June 24, 2016**, the parties shall submit the reports of expert witnesses whose testimony may be offered to respond to initial expert witnesses.

iii. ***Rebuttal Expert Witness Reports.*** By no later than **July 29, 2016**, the parties shall submit the reports of expert witnesses whose testimony may be offered to rebut responsive expert witnesses.

2. ***Class Certification.*** By no later than **September 9, 2015**, the plaintiffs shall file and serve their motion for class certification. The United States' response shall be filed and served by **November 9, 2015**, and the plaintiffs' reply shall be filed and served by **December 23, 2015.**

3. ***Amendment of Pleadings.*** The deadline for the amendment of pleadings, including the joinder of other parties, shall be **February 19, 2016.**

4. ***Dispositive Motions and Daubert Motions.*** By no later than **September 16, 2016**, the parties shall file and serve dispositive motions and motions under *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993). Responses to such motions shall be filed and served by **November 4, 2016**, and any replies shall be filed and served by **December 2, 2016**.

The parties respectfully request that the Court adopt this proposed schedule.

Dated: August 21, 2015

Respectfully submitted,

By: /s/ William H. Narwold
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*Attorneys for Plaintiffs Adam Steele,
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the Putative Class*

PROOF OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a member of the law firm MOTLEY RICE LLC, and my office is located at 20 Church Street, 17th Floor, Hartford, CT 06103.

On August 21, 2015, I caused to be filed the following in the above-captioned case:

**JOINT WRITTEN REPORT OUTLINING THE DISCOVERY
PLAN AND PROPOSED SCHEDULING ORDER**

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 21, 2015

Respectfully submitted,

By: /s/ William H. Narwold
William H. Narwold
MOTLEY RICE LLC