California Office

2001 Center Street, 4th Floor Berkeley, CA 94704-1204 Tel: (510) 665-8644

Fax: (510) 665-8511 www.dralegal.org **New York Office**

655 Third Avenue, 14th Floor New York, NY 10017-5621 Tel: (212) 644-8644

Fax: (212) 644-8636 www.dralegal.org

April 30, 2024

Via CM/ECF

Honorable J. Paul Oetken **United States District Court** Southern District of New York 40 Foley Square New York, NY 10007

DISABILITY RIGHTS

ADVOCATES

Re: National Association of the Deaf, et al. v. SiriusXM Holdings Inc., et al., No. 1:21cv-10542-JPO (S.D.N.Y.)

Your Honor,

Pursuant to your honor's direction at the April 16, 2024 informal conference, the parties write to provide the following proposed schedule for limited reopening of discovery and subsequent summary judgment briefing:

| Case Event | Proposed Deadline |
|--|-------------------|
| Close of fact discovery | August 14, 2024 |
| Deadline to meet and confer regarding settlement | August 21, 2024 |
| following the closure of fact discovery | |
| Expert Disclosures | October 31, 2024 |
| Rebuttal Expert Disclosures | December 6, 2024 |
| Close of Expert Discovery | January 10, 2025 |
| Plaintiffs' Summary Judgment Motion | February 28, 2025 |
| Defendants' Combined Summary Judgment Motion | April 2, 2025 |
| and Opposition | |
| Plaintiffs' Combined Opposition and Reply | May 2, 2025 |
| Defendants' Reply | May 16, 2025 |

Respectfully submitted,

/s/ Emily Roznowski Emily Roznowski Disability Rights Advocates For Plaintiffs

The proposed schedule for discovery and summary judgment briefing is hereby approved.

So ordered.

/s/ James Loonam

James Loonam Jones Day For Defendants

J. PAUL OETKEN United States District Judge