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June 19, 2020

**VIA ELECTRONIC COURT FILING**

Hon. Debra C. Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Jane Doe, 1:19-cv-8673 (KPF) (DCF)

Dear Judge Freeman:

The proposed schedule is adopted, except that, as stated at the telephone conference held on 6/24/20, counsel are directed to work together in good faith to conserve resources, and may have until 8/14/20 to complete the depositions contemplated by this schedule. The deadlines for the completion of expert discovery are extended as follows: Plaintiff's expert reports shall be served no later than August 14, 2020; Defendants' rebuttal reports shall be served no later than September 14, 202; expert discovery shall be completed no later than October 5, 2020.

Dated: 6/24/2020

SO ORDERED

  
DEBRA FREEMAN  
United States Magistrate Judge

We write on behalf of both parties in the above-referenced action pursuant to the Court's Order dated June 15, 2020 (ECF No. 73). The parties have conferred and agreed on the following discovery schedule, without prejudice to their respective rights to object to or seek any and all discovery.

- **Substantial completion of document production:**
  - July 3, 2020
- **Proposed depositions to take place on the following dates:**
  - June 30, 2020
  - July 2, 2020
  - July 7, 2020
  - July 9, 2020
  - July 13, 2020
  - July 15, 2020
  - July 17, 2020
  - July 20, 2020
  - July 22, 2020
  - July 23, 2020
  - July 27, 2020
- **Plaintiff's Rule 35 examination to take place:**
  - July 24, 2020

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Respectfully submitted,

s/Bennet J. Moskowitz  
Bennet J. Moskowitz

cc: Counsel of Record (via ECF)