

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiffs,

v.

WP COMPANY LLC, d/b/a THE
WASHINGTON POST,

Defendant.

No. 2:19-cv-19-WOB-CJS

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiffs,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

No. 2:19-cv-0031-WOB-CJS

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiffs,

v.

NBCUNIVERSAL MEDIA, LLC,

Defendant.

No. 2:19-cv-56-WOB-CJS

AGREED ORDER

Pursuant to the Court's January 8, 2020 Order, Plaintiff Nicholas Sandmann, Defendant WP Company, LLC d/b/a The Washington Post, Defendant Cable News Network, Inc., and Defendant NBCUniversal Media, LLC, by and through their counsel of record, respectfully submit this Agreed Order, scheduling deadlines pending the filing of any additional lawsuit(s) in this Court. Accordingly, it is HEREBY ORDERED that:

1. On or before Monday, February 17, 2020, Plaintiff shall file a status report advising the Court of any additional lawsuits that have been filed in this Court and any additional lawsuits that may be filed in this Court concerning the events of January 18, 2019, at the National Mall.

2. Pursuant to the agreement reached at the January 7, 2020, conference, Plaintiff shall endeavor in good faith to file any additional lawsuit(s) that he expects to file in this Court concerning a republication of the statements of Nathan Phillips that Plaintiff "blocked" Phillips and "would not allow him to retreat" on January 18, 2019 at the National Mall, on or before March 9, 2020, without prejudice to Plaintiff's right to file additional lawsuits prior to the expiration of the applicable statute of limitations.

3. After responsive pleadings have been filed in any additional lawsuits that have been commenced, the parties will file a status report proposing a new date to hold a joint Rule 26(f) Conference.

Dated: _____

Hon. William O. Bertelsman
United States District Judge

Tendered by:

/s/ Todd V. McMurtry
Todd V. McMurtry
Kyle M. Winslow
Hemmer DeFrank Wessels PLLC
250 Grandview Drive
Suite 500
Ft. Mitchell, KY 95343
Phone: (859) 344-1188
Fax: (859) 578-3869
Email: tmcmurtry@hemmerlaw.com

L. Lin Wood (*pro hac vice*)
Nicole Jennings Wade (*pro hac vice*)
Jonathan D. Grunberg (*pro hac vice*)
G. Taylor Wilson (*pro hac vice*)
L. LIN WOOD, P.C.
1180 W. Peachtree St., Ste. 2040
Atlanta, GA 30309
Phone: (404) 891-1402
Fax: (404) 506-9111
Email: lwood@linwoodlaw.com

Attorneys for Plaintiff

and

/s/ Bethany A. Breetz
Philip W. Collier
Bethany A. Breetz
STITES & HARBISON, PLLC
400 West Market Street, Suite 1800
Louisville, KY 40202-3352
Telephone: (502) 587-4500
bbreetz@stites.com

William G. Geisen
STITES & HARBISON, PLLC
100 East RiverCenter Boulevard, Suite 450
Covington, KY 41011
Telephone: (859) 652-7601

Kevin T. Baine (*pro hac vice*)
Thomas G. Hentoff (*pro hac vice*)
Nicholas G. Gamse (*pro hac vice*)

Katherine Moran Meeks (*pro hac vice*)
Whitney G. Woodward (*pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
thentoff@wc.com

Attorneys for The Washington Post

and

/s/ James E. Burke

James E. Burke (*pro hac vice*)
Sarah V. Geiger
Amanda B. Stubblefield
Keating Muething & Klekamp PLL
One East Fourth Street, Suite 1400
Cincinnati, OH 45202
Telephone: 513.579.6400
Fax: 513.579.6457
jburke@kmklaw.com
sgeiger@kmklaw.com
astubblefield@kmklaw.com

Charles D. Tobin (*pro hac vice*)
Maxwell S. Mishkin (*pro hac vice*)
BALLARD SPAHR LLP
1909 K Street, NW, 12th Floor
Washington, DC 20006
Telephone: (202) 661-2200
Fax: (202) 661-2299
tobinc@ballardspahr.com
mishkinm@ballardspahr.com

Leita Walker (*pro hac vice* pending)
BALLARD SPAHR LLP
2000 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2274
Telephone: (612) 371-6222
Fax: (612) 3713207
walkerl@ballardspahr.com

Attorneys for Cable News Network, Inc.

and

/s/ John C. Greiner

John C. Greiner (*pro hac vice*)

GRAYDON HEAD & RITCHEY LLP

312 Walnut Street, Suite 1800

Cincinnati, OH 45202

Phone: (513) 629-2734

Fax: (513) 333-4316

jgreiner@graydon.law

J. Stephen Smith

Darren W. Ford

GRAYDON HEAD & RITCHEY LLP

2400 Chamber Center Drive

Suite 300

Ft. Mitchell, KY 41017

Phone: (859) 578-3070

Fax: (859) 578-3071

ssmith@graydon.com

dford@graydon.com

Attorneys for NBCUniversal Media, LLC