

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNIVERSITY OF MASSACHUSETTS and)	
CARMEL LABORATORIES LLC,)	
)	
Plaintiffs,)	
)	C.A. No. 17-868-CFC-SRF
v.)	
)	
L'ORÉAL USA, INC.,)	
)	
Defendant.)	

STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER

WHEREAS, the parties met and conferred regarding an amendment to the discovery deadlines in the case schedule;

WHEREAS, the parties have agreed on extensions to fact and expert discovery deadlines without prejudice to either or both parties revisiting additional extensions;

WHEREAS, the parties' goal in proposing the below schedule modifications is to preserve the current trial date and, therefore, have only extended the initial expert reports and case dispositive opening briefs by one week and have maintained the deadlines for the answering and reply case dispositive briefs;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel and subject to the approval of the Court, that the Scheduling Order (D.I. 139) as previously amended, shall be amended as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosures/Reports Except for Plaintiffs' Damages Report	June 19, 2020	June 26, 2020
Close of Fact Depositions For Any Witness Due to Document Supplementation	June 19, 2020 ¹	No Change
Plaintiffs' Damages Expert Report	July 6, 2020	No Change
Response Expert Disclosures/Reports For Reports Served On June 19	July 14, 2020	July 21, 2020
Reply Expert Disclosures/Reports For Reports Served On June 19	July 31, 2020	August 7, 2020
Defendant's Responsive Damages Report	July 31, 2020	No Change
Plaintiffs' Reply Damages Expert Report	August 14, 2020	No Change
Expert Deposition Deadline For All Reports	August 21, 2020	August 28, 2020
Case Dispositive Motion Opening Briefs	September 4, 2020	September 11, 2020
Case Dispositive Motion Response Briefs	October 2, 2020	No Change
Case Dispositive Motion Reply Briefs	October 16, 2020	No Change
File Joint Pretrial Order	January 25, 2021 at 5 p.m.	No Change
Jury Instructions, Voir Dire and Special Verdict Forms	January 25, 2021 at 5 p.m.	No Change
Final Pretrial Conference	January 28, 2021 at 4 p.m.	No Change
Trial	Monday, February 8, 2021 at 9 a.m.	No Change

Dated: June 11, 2020

Respectfully submitted,

/s/ Brian E. Farnan

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¹ If necessary, non-technical L'Oreal USA witnesses may be deposed after June 19 but on or before June 30, 2020.

SO ORDERED this _____ day of _____, 2020.

The Honorable Colm F. Connolly