

February 5, 2024

VIA E-FILE

The Honorable Eric M. Davis
New Castle County Courthouse
500 North King Street
Wilmington, DE 19801

**RE: *US Dominion, Inc., et al. v. Newsmax Media, Inc.*
(C.A. No. N21C-08-063 EMD)**

Dear Judge Davis:

U.S. Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (collectively, Plaintiffs) write on behalf of the parties jointly to request a scheduling conference with Your Honor.

The parties are in agreement that the below changes to the discovery schedule, which the Special Master has reviewed, would best serve the interests of the parties and the case by allowing appropriate time for the parties to complete fact discovery. The parties' consent to changing the schedule is conditioned on other agreements already stipulated to by the parties and presented to the Special Master that are to be memorialized in an order by the Special Master. Because the changes to the discovery schedule, if approved by Your Honor, would necessitate moving the trial date (as well as associated pre-trial deadlines), we respectfully request a conference at Your Honor's convenience.

Item	Current Date	Revised Date
Fact depositions	February 28, 2024	July 31, 2024
Fact discovery	February 28, 2024	July 31, 2024
Opening Expert Reports	March 11, 2024	August 16, 2024
Rebuttal Expert Reports	April 15, 2024	September 16, 2024
Close of Expert Discovery	May 13, 2024	November 15, 2024
Dispositive Motion	July 18, 2024	December 16, 2024
Daubert Motions	July 18, 2024	December 16, 2024
Answering Brief on Dispositive Motion	August 15, 2024	January 31, 2025
Responses to Daubert	August 20, 2024	February 5, 2025
Reply Brief on Dispositive Motion	September 6, 2024	February 28, 2025

Regarding the existing CMO's mediation deadline, *see* Case Management Order § IV, the parties report they engaged a private mediator but that the mediation was unsuccessful.

Respectfully submitted,

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)

cc: Richard L. Renck (Via E-File)
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