UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

LIBERTY FORD LINCOLN MERCURY, INC., *et al.*,	)	Case No. 1:21-cv-02085
	)	
	)	Judge J. Philip Calabrese
Plaintiffs,	)	
	)	Magistrate Judge
v.	)	Jonathan D. Greenberg
	)	
FORD MOTOR COMPANY,	)	
	)	
Defendant.	)	
	)	

STATUS REPORT OF SPECIAL MASTER AND PROPOSED CASE MANAGEMENT PLAN

On May 3, 2023, the Court issued an Order appointing the undersigned as a Special Master, to address, among other things, pending discovery matters and scheduling issues. (ECF No. 61.)

The purpose of this report is to advise the Court that the undersigned and the parties have worked diligently to come to an agreed-upon "Case Management Plan" and to respectfully submit the attached proposed Case Management Plan for the Court's approval.

Following the undersigned's Discovery Order #1, filed on July 5, 2023 (ECF No. 63), and the Court's resolution of objections to that order on August 4, 2023 (ECF No. 73), and pursuant to the Court's May 3, 2023 appointment order (ECF No. 61), the undersigned has continued to work with the parties to resolve ongoing discovery disputes in an effort to move the case forward in a manner that conserved

judicial resources. That process has taken roughly five months. In the interest of saving time (and therefore costs to the parties), the undersigned will not list each step in that process.

To summarize, and for context, the last five months have included ten Zoom conferences with the parties, one in-person proceeding in Cleveland, and the undersigned's "real time" supervision of a Rule 30(b)(6) deposition. During this time frame, the undersigned proposed a "Working Case Management Plan," which the undersigned discussed and refined with the parties, to arrive at the attached agreed-upon plan, which is the fifth version of the plan.

The undersigned has advised the parties that the dates set forth in the plan are firm dates, and that any reasons for relief from these dates will be limited to extraordinary circumstances.

Respectfully submitted,

Dated: December 29, 2023 Special Master: Jane D. Thomas