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.	)	
	)	

SECOND AMENDED CASE MANAGEMENT PLAN AND SCHEDULING ORDER

On the recommendation of the Special Master, the Court adopts the proposed Case Management Plan forth below:

A. Document Productions/Issues

1. Plaintiffs' and Defendant's productions, in the main, were completed as of October 31, 2023.

2. Document issues to be resolved by the Special Master no later than February 2, 2024:

   a. Plaintiffs' issues with Defendant's production. *See*, *e.g.*, Special Master Index of Issues dated December 11, 2023.

   b. Defendant's issues with Plaintiffs' production. None raised as of December 12, 2023, and no issues anticipated.

   c. Final Document Discovery Hearing. An in-person hearing/ conference on the record beginning January 25, 2024 and, if necessary, continuing on January 26, 2024.

B. Non-Expert Depositions

Identified, scheduled, and completed by March 29, 2024.

To be completed between February 12, 2024 and April 19, 2024:

1. During the November 28, 2023, Zoom conference, the Special Master confirmed with the parties that no agreements pending between the parties regarding the number of depositions would be permitted and, therefore, the ten-deposition limit without leave set forth in Rule 30(a)(2)(A)(i) shall apply.

2. During the week of January 8, 2024, the parties and the Special Master are to develop (as discussed with the parties in the December 18, 2023 Zoom conference) a tentative agreed schedule for the first tranche of depositions to be completed between February 12, 2024 and March 21, 2024. The period of March 22, 2024 to April 19, 2024 is reserved for any additional depositions that may be approved on motion. Any such motions are due not later than March 1, 2024.

C. Experts

All reports and depositions completed by August 21, 2024.

1. Plaintiffs to identify experts by March 15, 2024, with reports due to Defendant no later than May 14, 2024.

2. Defendant to identify rebuttal experts by April 19, 2024, with reports due to Plaintiff no later than July 19, 2024.

3. Parties to complete expert depositions by August 21, 2024.

D. Defendant's Dispositive Motion

Deadline to file is September 20, 2024.

SO ORDERED.

Dated: December 28, 2023

J. Philip Calabrese
United States District Judge
Northern District of Ohio