

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

NATIONAL ASSOCIATION FOR THE )  
ADVANCEMENT OF COLORED )  
PEOPLE, et al., )  
 ) Case No. 8:18-cv-00891-PWG  
Plaintiffs, )  
 )  
vs. )  
 )  
BUREAU OF THE CENSUS, et al., )  
 )  
Defendants. )

**[PROPOSED] SCHEDULING ORDER**

Pursuant to the Court's instructions during the March 6, 2019 telephone conference, counsel for all parties jointly submit this letter setting forth the discovery schedule and limitations for Plaintiffs' constitutional claim regarding the funding of the 2020 Census and Defendants' discovery, as agreed upon by the parties and as ordered by the Court during the March 6 conference.

I. DISCOVERY

1. Initial disclosures pursuant to Rule 26(a)(1) need not be made in this case.
2. Plaintiffs may propound up to 15 Requests for Production, up to 15 Interrogatories, and up to 15 Requests for Admission relating to Plaintiffs' constitutional claim regarding the funding of the 2020 Census. Requests for Admission relating to the genuineness or authenticity of documents shall not count towards Plaintiffs' limit of 15 Requests for Admission.
3. Plaintiffs will conduct one Rule 30(b)(6) deposition. The parties will meet and confer regarding the scope and topics of this deposition. Plaintiffs may take up to three oral depositions of fact witnesses. The time limit for each of these depositions is 7 hours.
4. Defendants may propound up to 15 Requests for Production, up to 15 Interrogatories, and up to 15 Requests for Admission. Requests for Admission relating to the genuineness or authenticity of documents shall not count towards Defendants' limit of 15 Requests for Admission.
5. Defendants may conduct one Rule 30(b)(6) deposition. The Parties will meet and confer regarding the scope and topics of this deposition. Defendants may take up to three oral depositions of fact witnesses. The time limit for each of these depositions is 7 hours.
6. Each side may disclose up to three experts.

7. If Plaintiffs or Defendants seek additional discovery, the parties will confer and submit a letter to the Court—not to exceed three, single-spaced pages—indicating the agreed-upon discovery and, if necessary, requesting a conference with the Court regarding any discovery sought to which the parties do not agree.

## II. DEADLINES

The parties jointly propose that the following deadlines be set:

April 4, 2019:	Deadline for conference about discovery of electronically stored information
June 18, 2019:	Plaintiffs' Rule 26(a)(2) expert disclosures
July 8, 2019:	Defendants' Rule 26(a)(2) expert disclosures
July 29, 2019:	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures
August 26, 2019:	Rule 26(e)(2) supplementation of disclosures and responses
August 28, 2019:	Discovery deadline; submission of status report

Respectfully submitted,

/s/ Michael J. Wishnie

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<sup>1</sup> This letter does not purport to state the views of Yale Law School, if any.

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<sup>†</sup> Application for D. Md. admission pending

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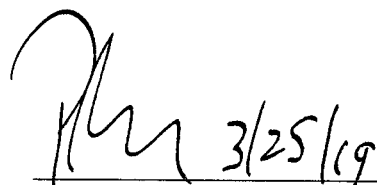
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*Counsel for Defendants*

**SO ORDERED.**

**DATED:** Greenbelt, Maryland

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3/25/19  
\_\_\_\_\_  
United States District Judge

**Paul W. Grimm**  
**United States District Judge**