

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jason Carr, Vicki LeMaster, Edward Ford
Services LLC, Carlton Morgan, 365 Sun
LLC and Candice Worthy, *individually and
on behalf of all others similarly situated,*

Plaintiffs,

v.

Kabbage, Inc. d/b/a K Servicing,

Defendant.

Civil Action
No.1:22-cv-01249-VMC

[PROPOSED] SCHEDULING ORDER

The parties respectfully submit the following proposed Scheduling Order for the Court's consideration. Having considered the parties' joint request and for good cause shown, it is hereby **ORDERED** that the following schedule shall apply to this matter:

<u>EVENT</u>	<u>DUE DATE</u>
1. Joint Preliminary Report and Discovery Plan required by Local Rule 16.2	6/29/2022
2. Initial Disclosures required by Local Rule 26.1	6/29/2022
3. If Needed, Parties Begin Meet and Confer Process Regarding Scope of Initial Document Requests	Within 14-days following the Court's ruling on Defendant's Motion to Dismiss

4. If Needed, Parties File Joint Proposed ESI Protocol and Stipulated Protective Order	Within 14-days following the Court's ruling on Defendant's Motion to Dismiss
5. Beginning of Discovery pursuant to L.R. 26.2(A)	30 days after Defendant files answer
6. Parties shall identify their initial experts and serve their initial expert written report(s) in accordance with F. R. Civ. P. 26(a)(2)(B)	Six months after the beginning of fact discovery
7. Parties shall identify any rebuttal and/or reply expert written reports in accordance with F. R. Civ. P. 26(a)(2)(B)	Forty-five (45) after initial expert report
8. Discovery Closes	Eight months after beginning of fact discovery
11. L.R. 16.3 Conference	Two weeks after close of discovery
12. Plaintiffs' file Class Certification Motion along with Class Certification Expert Declarations in Support	Six weeks after Rule 16.3 Conference
13. Defendant files any Opposition to Plaintiffs' Class Certification Motion along with any Expert Declarations in Support	Forty-five (45) days after service of Plaintiffs' motion
14. Plaintiffs file any Reply in Support of Motion for Class Certification. [Plaintiffs may also file any Rebuttal Expert Declarations in Support.]	Twenty-one (21) days after service of Defendants' opposition
15. If Needed, Parties Meet and Confer and Propose a Case Schedule to the Court for Any Remaining Case Activities	Within 14 days following the Court's ruling on Plaintiff's Motion for Class Certification

So ORDERED, this ____ day of July, 2022.

Hon. Victoria M. Calvert
United States District Judge
Northern District of Georgia