

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

VISA INC.,

Defendant.

Case No. 1:24-cv-07214-JGK-SLC

 **PROPOSED ORDER AMENDING SCHEDULING AND CASE
MANAGEMENT ORDER**

WHEREAS, the United States of America (the “United States” or “Government”) and Visa Inc. (“Visa”) (together, the “Parties”) have continued to discuss effective case management with the goal of promoting efficiency during fact discovery, particularly during depositions;

WHEREAS, the Parties have met and conferred and agreed, subject to Court approval, to the below amendments to the Joint Amended Scheduling and Case Management Order of January 22, 2026 (“Scheduling Order”), ECF No. 123:

- **Updated Preliminary Fact Witness List:** Section 8 of the Scheduling Order shall be amended to permit the Parties to exchange updated preliminary fact witness lists on August 19, 2026.
- **Final Witness Lists:** Section 10(c) of the Scheduling Order concerning Final Witness Lists shall be withdrawn and replaced with the following: “Each Party shall provide a final witness list 12 weeks before trial. No more than 30 persons, excluding experts, may be included on each final witness list. The witnesses included on each final witness list shall be limited to those witnesses previously included on the Party’s updated preliminary fact witness list, except that up to 7 names on the final witness list

may be witnesses that were not included in the updated preliminary fact witness list, provided that those witnesses were deposed during the fact discovery period. Additionally, the Parties may include other substitutions or amendments for good cause or on the agreement of the Parties. The Parties agree that it shall constitute good cause to modify the final witness list to replace or remove a witness if that witness departs from the company that employed the witness at the time of their deposition. If, based on agreement or good cause, any new fact witnesses are added to a final trial witness list who were not on any Party's updated preliminary fact witness list and were not previously subject to custodial discovery or deposed, the Parties agree to negotiate in good faith as to whether additional document discovery related to those witnesses or depositions of those witnesses may be appropriate."

The Parties appreciate the Court's consideration of this proposed Order.

DATED: June 15, 2026

Respectfully submitted,

By: /s/ Michele Trichler

/s/ Kieran Gostin

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SO ORDERED:



U.S.D.J.

6/16/26