

April 14, 2021

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, NY 11201-1820

Re: *Guan, et al. v. Mayorkas, et al.*,
Civil No. 19-CV-6570-PKC-RER
Case Management Plan

Dear Judge Reyes,

Pursuant to this Court's order of March 31, 2021, ECF No. 39, counsel for the Plaintiffs and the Defendants in the above-captioned matter have met and conferred and propose the below Case Management Plan, in advance of the conference scheduled for April 21, 2021 at 12:30 PM. The Case Management Form is attached.

The deadlines specified in the proposed Case Management Plan reflect an extension of two months from standard discovery deadlines, where applicable. The parties specifically request a stay of discovery for two months following the scheduled conference, and propose that discovery shall not commence before June 21, 2021 in item number 1, below. Undersigned lead counsel for Plaintiffs anticipates going on leave in June 2021, while another of Plaintiffs' counsel is currently on leave. This extension of time will better enable Plaintiffs' counsel to manage discovery in this case with other ongoing litigation deadlines.

Additionally, the Case Management Plan reflects this Court's order granting Defendants a one-month extension of time to file their Answer to the Complaint, by May 13, 2021. Minute Order of April 9, 2021.

Proposed Case Management Plan

1. Discovery shall not commence before June 21, 2021.
2. Defendants shall answer or otherwise move with respect to the complaint by May 13, 2021.
3. No additional parties may be joined after April 21, 2021.



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4. No amendment of the pleadings will be permitted after April 21, 2021.
5. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: July 6, 2021.
6. The parties shall make required Rule 26(a)(2) disclosures with respect to
 - a. Expert witnesses on or before: September 22, 2021
 - b. Rebuttal expert witnesses on or before: October 22, 2021
7. All discovery, including depositions of experts, shall be completed on or before December 21, 2021.
8. Pre-motion letters regarding dispositive motions must be submitted within one (1) weeks following the close of all discovery and responses are due one week later.

Pursuant to Judge Reyes's Individual Practices and Rules, only a copy of this letter will be filed on the public docket at this time.

Respectfully submitted,

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Attorneys for Defendants

Encl.: Case Management Plan Form



Certificate of Service

I hereby certify that on this 14th day of April, 2021, I electronically filed the foregoing letter and Case Management Plan form using the Court's CM/ECF system, which effects service upon all counsel registered with the CM/ECF system.

s/ Esha Bhandari
Esha Bhandari

