

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM CORPORATION,
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
COLUMBIA PICTURES INDUSTRIES, INC., and
WARNER BROS. ENTERTAINMENT INC.,

Plaintiffs,

v.

HOTFILE CORP., ANTON TITOV, and
DOES 1-10.

Defendants.

JOINT PROPOSED SCHEDULING ORDER

The parties having submitted their Fed. R. Civ. P. 26(f) and Local Rule 16.1 Report, it is hereby Ordered that:

1. This case is assigned to the Standard Track.
2. All motions to join additional parties or amend the pleadings shall be filed no later

than the following date:

[August 1, 2011 (Plaintiffs' proposal)]

[June 15, 2011 (Defendants' proposal)].

3. The parties will exchange privilege logs no later than June 15, 2011.
4. The parties will make expert disclosures under Fed. R. Civ. 26(a)(2) and Local Rule 16.1(k) by September 9, 2011.

5. The parties will exchange rebuttal expert reports by the following date:

[September 23, 2011 (Plaintiffs' proposal)]

[November 11, 2011 (Defendants' proposal)]

6. The parties shall complete discovery by the following date:

[October 17, 2011 (Plaintiffs' proposal)]

[January 16, 2012 (Defendants' proposal)]

7. Each party may bring a motion for summary judgment on any grounds by the following date:

[November 30, 2011 (Plaintiffs' proposal)]

[January 30, 2012 (Defendants' proposal)]

8. [Plaintiffs' proposal: Summary judgment motions on liability may be filed and resolved based on a sample of works that Plaintiffs allege to have been infringed. Discovery regarding additional works that Plaintiffs allege to have been infringed is deferred until the Court has ruled on summary judgment on liability. The parties will meet and confer within 5 days of the Court's decision to determine whether any additional discovery related to the remaining works alleged to be infringed is necessary prior to trial, and jointly propose a timeline and process for completing such discovery limited to that single topic.]

9. [Defendants' proposal: Each party may bring a motion for summary judgment regarding application of the DMCA "safe harbor" by June 15, 2011. Discovery will be conducted as necessary, limited to the issues raised by those motion(s), pending further order of the Court. In the event that this motion practice does not completely resolve the case, each party may bring a motion for summary judgment on any remaining grounds by January 30, 2012.]

10. All pretrial motions shall be filed no later than _____.

11. All pretrial motions shall be resolved by the Court no later than

_____..

12. A pretrial conference shall be held on _____.

13. Trial shall commence on _____.

DONE and ORDERED in Chambers, in Miami, Florida, this _____ day of _____, 2011.

Hon. Adalberto Jordan
United States District Court Judge