EXHIBIT A

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

CAMBRIDGE UNIVERSITY PRESS, et al.,

Plaintiffs,

Civil Action File No.1:08-CV-1425-ODE

-v-

MARK P. BECKER, in his official capacity as Georgia State University President, et al.,

Defendants.

[PROPOSED] SCHEDULING ORDER REGARDING SUPPLEMENTATION OF DISCOVERY AND BRIEFING

Upon review of the Parties' Proposed Scheduling Orders Regarding
Supplementation of Discovery and Briefing, the Court orders that the Parties shall
proceed according to the following schedule:

(a) <u>Document Discovery</u>:

By November 5, 2010, Defendants shall produce updated ERes reports for the 2009 Maymester, Summer 2009 term, and Fall 2009 term.

By November 30, 2010, or 15 days after the Court rules on Plaintiffs' Motion for Reconsideration, whichever is later, Defendants shall produce the following documents:

 $\begin{array}{l} \text{US_ACTIVE:} \\ 43535290 \\ 04 \\ 38985.0007 \\ 7465087.1 \end{array}$

- Available syllabi for each course identified in Plaintiffs' August 20, 2010 submission to the Court;
- Available fair-use checklists for each work identified in Plaintiffs' August 20, 2010 submission to the Court;
- Existing licenses (if any) for each work identified in Plaintiffs' August 20, 2010 submission to the Court; and
- Such additional discovery, if any, as may be ordered by the Court in response to Plaintiffs' Motion for Reconsideration.

By the same deadline, Plaintiffs shall produce the following:

- Supplemental responses to Defendant document requests and interrogatories relating to Plaintiffs' ownership and/or licensing of the subject works;
- Supplemental responses to Defendant document requests and interrogatories relating to copyright registrations for the subject works;
- Supplemental responses to document requests and interrogatories relating to the effect on the market of Defendants' use of each of the subject works.
- (b) <u>Depositions</u> of up to five GSU witnesses shall be completed within 45 days of the deadline for document production.
- (c) <u>Plaintiffs Initial Filing</u>: Within 21 days of the completion of depositions, Plaintiffs shall file their submission setting forth instances of claimed copyright infringement of the works identified in the Court's September 30, 2010 Order.
- (d) <u>Defendants' Opening Brief</u>: Within 30 days of Plaintiffs Initial Filing, Defendants shall submit their opening brief as to the claimed infringements.

Exhibit A 2

(e) <u>Depositions of Additional Declarants</u>: In the event Defendants submit supporting declarations from witnesses not previously deposed by Plaintiffs,

Plaintiffs shall be provided the opportunity to conduct a deposition lasting no more than two hours of each such declarant.

(f) <u>Plaintiffs' Opposition Brief</u>: Within 30 days of the filing of Defendants' Opening Brief or the completion of any depositions taken pursuant to paragraph (e), whichever is later, Plaintiffs shall submit an opposition brief as to the claimed infringements.

(g) <u>Defendants' Reply</u>: Within 21 days of the filing of Plaintiffs' Opposition Brief, Defendants shall submit their reply brief as to the claimed infringements.

SO ORDERED this	day of	, 2010.
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Hon. Orinda D. Evans

United States District Judge

Prepared by:

Todd D. Larson Attorney for Plaintiffs

Exhibit A 3