

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

DANIEL J. CARRO,

Plaintiff,

v.

MARY T. BARRA, DANIEL F.
AKERSON, MICHAEL P. MILLIKIN,
AND JOHN CALABRESE,

Defendants,

-and-

GENERAL MOTORS COMPANY,

Nominal Defendant.

No. 16-cv-10479-RHC

JOINT SCHEDULING ORDER

Pursuant to the Court's January 10, 2017, Order (Docket #20), the parties to the above-captioned action have met and conferred regarding scheduling and jointly submit the attached proposed scheduling order to address the immediate next steps in the litigation. As required by the order, the parties have also met and conferred regarding Rule 26(f) issues, including those identified in the Court's Sample Outline for a Rule 26(f) Plan and Status Report. Given the early stage of the litigation and plaintiff's intent to file an amended complaint, the parties submit that it may be premature to address many of the issues set out in the sample outline. Of course, if the Court did anticipate

the filing of a formal Rule 26(f) report, the parties will do so promptly and will be prepared to discuss the issues at the Scheduling Conference set for February 7, 2017.

The parties jointly submit the attached proposed order providing a schedule for plaintiff's filing of his amended complaint and defendants' response thereto.

/s/ Andrew J. Morganti

Andrew J. Morganti (P57989)

MORGANTI LEGAL

535 Griswold Street, Suite 111-181

Detroit, MI 48226

(248) 787-6078

(416) 800-2171 (Fax)

amorganti@morgantilegal.com

Local Counsel for Plaintiff

**SCHUBERT JONCKHEER &
KOLBE LLP**

Robert C. Schubert

Willem F. Jonckheer

Three Embarcadero Center, Suite 1650

San Francisco, CA 94111

(415) 788-4220

(415) 788-0161 (Fax)

rschubert@schubertlawfirm.com

wjonckheer@schubertlawfirm.com

Counsel for Plaintiff

/s/ Raymond W. Henney

Raymond W. Henney (P35860)

HONIGMAN MILLER SCHWARTZ

AND

COHN LLP

660 Woodward Avenue, Suite 2290

Detroit, MI 48226

(313) 465-7410

rhenney@honigman.com

KIRKLAND & ELLIS LLP

Robert J. Kopecky (IL #3125334)

Joshua Z. Rabinovitz (IL #6272899)

300 N. LaSalle Street

Chicago, IL 60654

(312) 862-2000

Robert.Kopecky@kirkland.com

Joshua.Rabinovitz@kirkland.com

*Counsel for General Motors
Company*

s/ Daniel J. LaCombe

Daniel J. LaCombe (P38602)

**BARRIS, SOTT, DENN & DRIKER
PLLC**

211 W. Fort Street, 15th Floor

Detroit, MI 48226

(313) 965-9725

DLacombe@bsdd.com

*Counsel for the Individual
Defendants*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DANIEL J. CARRO,

Plaintiff,

v.

MARY T. BARRA, et al.,

Defendants,

No. 16-cv-10479-RHC

SCHEDULING ORDER

The Court hereby ORDERS, accepting the proposal of the parties to this case, the following schedule:

1. Plaintiff shall file his amended complaint on or before March 6, 2017.
2. Defendants shall file their response to the amended complaint on or before April 5, 2017.
3. If Defendants file a motion to dismiss, Plaintiff shall file any opposition brief on or before May 5, 2017, and Defendants shall file any reply brief on or before May 26, 2017.

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: January 26, 2017

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, January 26, 2017, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(810) 984-2056