

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NEW YORK JETS LLC and	:	
JETS DEVELOPMENT LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 05-CV-2875 (HB)
	:	
CABLEVISION SYSTEMS CORPORATION,	:	
CSC HOLDINGS, INC., and MADISON	:	
SQUARE GARDEN L.P.,	:	
	:	
Defendants.	:	

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**JOINT MOTION TO AMEND SCHEDULE FOR EXPERT DISCOVERY**

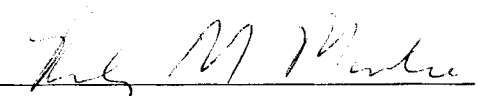
Pursuant to Fed. R. Civ. P. 16(b), the parties hereby jointly request that the current Scheduling Order, under which the parties must complete discovery by March 31, 2006, be revised to extend the dates relating to expert discovery. As grounds for this motion, the parties state that the number of experts involved, and the volume of fact and expert discovery in this case, have made it virtually impossible to conclude expert discovery by March 31, 2006. The parties' proposed amendment would not affect any other dates in the Scheduling Order. In particular, the parties' proposed amendment would not affect the May 15, 2006 deadline relating to dispositive motions, the July 17, 2006 deadline for submitting the Joint Pretrial Order, or the August 2006 trial date set by this Court.

The parties respectfully request that the Scheduling Order be modified to reflect the following schedule for expert discovery:

March 10, 2006	Deadline for expert reports for party with the burden of proof
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March 31, 2006	Deadline for completing depositions of experts who filed reports on March 10
April 5, 2006	Deadline for responsive expert reports
April 14, 2006	Deadline for completing depositions of experts who filed responsive reports
April 20, 2006	Deadline for rebuttal reports (rebuttal reports will be permitted only to the extent that a responsive report addresses an issue that was not raised in the opening report). Depositions of experts filing rebuttal reports, if any, will be completed by May 2.

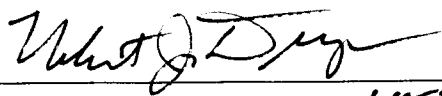
Dated: December 27, 2005



Randy M. Mastro (RM-9492)  
Jennifer H. Rearden (JR-2552)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
Tel: (212) 351-4000  
Fax: (212) 351-4035

Miguel A. Estrada (ME-4227)  
Theodore B. Olson  
Michael L. Denger  
Joshua Lipton  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036-5306  
Tel: (202) 955-8500  
Fax: (202) 467-0539

*Counsel for Defendants Cablevision  
Systems Corporation, CSC Holdings,  
Inc., and Madison Square Garden, L.P.*



Robert J. Dwyer (RD-~~9629~~) 6457200  
Paul R. Verkuil (PV-5978)  
Alanna C. Rutherford (AR-0497)  
BOIES, SCHILLER & FLEXNER LLP  
570 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-2300

David Boies (DB-4399)  
BOIES, SCHILLER & FLEXNER LLP  
333 Main Street  
Armonk, NY 10504  
Tel: (914) 749-8200

*Of Counsel:*

Jonathan D. Schiller  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue NW  
Washington, DC 20015  
Tel: (202) 237-2727

Marc E. Kasowitz (MK-2597)  
Daniel R. Benson (DB-6587)  
Daniel J. Fetterman (DF-9093)  
KASOWITZ, BENSON, TORRES  
& FRIEDMAN  
1633 Broadway  
New York, NY 10019

Tel: (212) 506-1700

*Counsel for Plaintiffs New York Jets LLC  
and Jets Development LLC*

SO ORDERED this \_\_\_\_ day  
of \_\_\_\_\_, 2005:

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HAROLD BAER, JR.  
UNITED STATES DISTRICT JUDGE  
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