UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	(

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.

## 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

New York Jets LLC et al v. Cablevision Systems Corporation et al 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

Doc. 52

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DATE FILES:

March 31, 2006 Deadline for completing depositions of experts who filed

reports on March 10

Document 52

April 5, 2006 Deadline for responsive expert reports

Deadline for completing depositions of experts who filed April 14, 2006

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

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ORDER

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Counsel for Plaintiffs New York Jets LLC and Jets Development LLC

SO ORDERED this \_\_\_\_ day

HARØLD BAER, JR.

UNITED STATES DISTRICT JUDGE 80550385\_2.DOC

January 20, 2006

## **Endorsement**:

So long as this change does not affect motion and trial schedule—it's fine with me—and I gather it does not.