

the searches themselves? Were the emails to remain with the various vendors and not to be centralized, how much does the Defendants' e-discovery vendor estimate it would cost to run hit reports and searches? Defendants should compile enough data for the Court to be able to discern the approximate difference in cost between running the searches Defendants are proposing and running the searches Plaintiff is proposing. If there are significant differences in costs between running searches for the period June 1, 2013 – October 1, 2018 and the period October 1, 2018 – August 10, 2020, the letter should explain that and should quantify the difference.

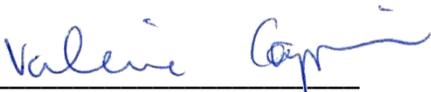
IT IS FURTHER ORDERED that by no later than **Friday, May 21, 2021**, armed with this additional cost information, the parties must inform the Court whether they have been able to agree on a list of ESI search terms. If the parties are unable to agree upon a list of search terms, by the same date, the parties must file a joint letter listing the disputed search terms. The Court reminds Plaintiff that any proposed list must be reasonable and that the Court may require Plaintiff to pay for a portion of the costs associated with searches that the Court finds to be not proportional to the needs of the case.

IT IS FURTHER ORDERED that the fact discovery deadline is adjourned to **Thursday, September 30, 2021**. The pretrial conference currently scheduled for July 2, 2021 is hereby adjourned to **Friday, October 8, 2021, at 9:30 A.M.** Pre-conference submissions are due no later than **Thursday, September 30, 2021**. For the content of the pre-conference submissions, the parties should consult paragraph 10 of their case management plan at docket entry 38. The expert discovery deadline is adjourned to **Friday, November 19, 2021**.

IT IS FURTHER ORDERED that the parties may skip their monthly joint status update for the month of May. The next monthly status report is due no later than **Tuesday, June 1, 2021**. *See* Order, Dkt. 57 at 2.

SO ORDERED.

**Date: April 27, 2021
New York, New York**



VALERIE CAPRONI
United States District Judge