

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

IBM ARBITRATION AGREEMENT
LITIGATION

Case No. 1:21-cv-06296-JMF

ECF Case

~~PROPOSED~~ ORDER

WHEREAS, on December 9, 2021, District Judge Furman entered an order directing Plaintiffs to provide Defendant by December 16, 2021, any proposed amended pleadings for review;

WHEREAS, the December 9, 2021 order also directed the parties to “confer regarding whether IBM will oppose any motion to file [Plaintiffs’ proposed] amended pleadings” and to “submit to the court their joint or separate proposals for the briefing of any such motions” for leave to amend;

WHEREAS, on December 16, 2021, Plaintiffs provided to Defendant for review the proposed amended complaint of Plaintiff William Abt;

WHEREAS, Defendant opposes the filing of the proposed amended complaint

WHEREAS, the parties have conferred and agreed to the following briefing schedule for Plaintiff Abt’s anticipated Fed. R. Civ. P. 15 motion for leave to amend:

Date	Deadline
January 14, 2022	Service and filing of Plaintiff Abt’s motion for leave to amend and supporting memorandum of law
January 28, 2022	Service and filing of Defendant’s memorandum of law in opposition to motion for leave to amend
February 4, 2022	Service and filing of Plaintiff Abt’s reply memorandum of law in support of motion for leave to amend

SO ORDERED

Dated: January 3, 2022

New York, New York



Hon. Jesse M. Furman
United States District Judge

Agreed:

s/ Shannon Liss-Riordan

Shannon Liss-Riordan
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800
Email: sliss@llrlaw.com

Attorney for Plaintiffs

s/ Matthew W. Lampe

Matthew W. Lampe
JONES DAY
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7309
mwlampe@jonesday.com

*Attorney for Defendant
International Business Machines Corp.*