


STATE OF MISSOURI   )  
                                  ) SS  
CITY OF ST. LOUIS   )

MISSOURI CIRCUIT COURT  
TWENTY-SECOND JUDICIAL CIRCUIT  
(City of St. Louis)

**FILED**  
JAN 23 2020

22<sup>ND</sup> JUDICIAL CIRCUIT  
CIRCUIT CLERK'S OFFICE  
BY  DEPUTY

ST. LOUIS REGIONAL	)	
CONVENTION AND SPORTS	)	
COMPLEX AUTHORITY, et al.,	)	
	)	No. 1722-CC00976
Plaintiffs,	)	
	)	Division No. 19
vs.	)	
	)	
NATIONAL FOOTBALL LEAGUE,	)	
et al.,	)	
	)	
Defendants.	)	

**SCHEDULING ORDER**

The Court has before it Plaintiffs' and Defendants' Motions for Entry of a Scheduling Order. The Court hereby enters the following scheduling order:

1. All Non-Expert Written Discovery: All written discovery including answers to interrogatories or requests for production currently served shall be delivered to the serving party by **February 17, 2020**. By **February 28, 2020**, the Rams Football Club, LLC, and E. Stan Kroenke (the "Rams Defendants") shall supplement all interrogatory responses. By **March 9, 2020**, the Rams Defendants shall produce all privilege logs. All motions to compel regarding such written discovery shall be filed by **April 15, 2020**. Parties

shall comply with all rulings on motions to compel discovery within 7 days of issuance of the order.

2. All Non-Expert Discovery: All non-expert discovery, including depositions of Plaintiffs, Defendants, and any third-party witnesses, shall be completed by April 2, 2021. Any written interrogatories or requests for production served after entry of this Order shall be served by a date that allows the served party or parties a full thirty (30) days as provided by the Missouri Rules of Civil Procedure in which to answer or to produce documents by the close of discovery on April 2, 2021.

3. Expert Witness Disclosure: Expert witnesses shall be disclosed as set forth in Missouri Rule of Civil Procedure 56.01(b)(4), as follows:

Plaintiffs shall disclose expert witnesses no later than February 5, 2021. Plaintiffs shall make experts available for deposition no later than March 5, 2021.

Defendants shall disclose expert witnesses no later than April 2, 2021. Defendants shall make experts available for deposition no later than April 30, 2021.

Expert reports and discoverable materials shall be produced seven (7) days prior to the expert's deposition.

4. Dispositive Motions: All dispositive motions shall be filed no later than May 7, 2021. For dispositive motions filed any time prior to the dispositive motion deadline, opposition briefs or objections to such motions will be due in 30 days after service of the motion. Reply briefs will be due 14 days after service of

the opposition. For dispositive motions filed on the deadline of May 7, 2021, opposition briefs shall be filed no later than June 7, 2021. Reply briefs shall be filed no later than June 21, 2021. Hearings on any dispositive motion shall take place within fourteen (14) days of the filing of the reply brief, subject to the Court's availability.

5. Punitive Damages: All motions regarding punitive damages shall be filed no later than May 7, 2021, with opposition briefs filed by May 21, 2021. Defendants will complete discovery production regarding punitive damages, including all evidence sought of each defendant's net worth, by June 15, 2021. Defendants will produce all defendants and any defense witnesses that provide punitive damage information for deposition by August 20, 2021.

6. Pre-Trial Disclosure:

- A. The parties shall exchange a list of all persons who may be called as witnesses on or before September 17, 2021.
- B. The parties shall exchange a list of all anticipated exhibits on or before September 17, 2021. Electronic copies of the exhibits shall be exchanged by September 24, 2021. Demonstrative exhibits shall be exchanged by October 11, 2021.
- C. Deposition testimony to be used at trial shall be filed by the parties no later than August 6, 2021, by indicating the pages and lines they intend to offer into evidence. The parties shall file objections and counter designations by August 31, 2021. Objections to the counter designations shall be filed by September 7, 2021, after which the parties shall meet and confer to resolve any disputes. All motions relating to these designations shall be submitted to the Court by September 17, 2021.

Any portions of depositions not included within the above designations may only be offered or used by the parties at trial for purposes of impeachment and rebuttal testimony, or by leave of Court.

7. Mandatory Conference Between Parties: Prior to the Pre-Trial Conference, the parties shall confer with one another for the purpose of agreeing to stipulate to evidentiary facts, the admissibility of exhibits, the authenticity of documents, and the joint use of certain exhibits so as to avoid duplication of documents. Any stipulations reached regarding exhibits shall be noted on the parties' Exhibit Lists.

8. Motions in Limine: All motions in limine shall be filed no later than August 20, 2021. Opposition briefs shall be filed no later than ten (10) days after the motion is filed. The motions shall be presented for ruling on or before the pre-trial conference.

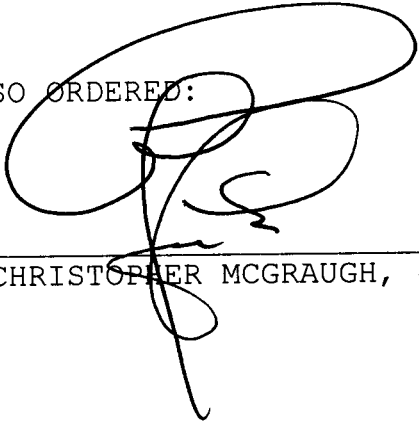
9. Jury Instructions: The parties will exchange their proposed jury instructions and provide copies of the proposed instructions to the Court on August 20, 2021. Defendants will tender proposed converse and affirmative defense instructions on August 27, 2021

10. Pre-Trial Conference: The pre-trial conference is scheduled for September 24, 2021, at 9:00 a.m.

11. Trial Setting: A jury trial shall be set beginning October 25, 2021.

12. Amendment by Consent: Other than the trial date, all other deadlines may be modified by agreement of the parties without further order of the Court.

SO ORDERED:



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CHRISTOPHER MCGRAUGH, Judge

Dated: 23 January 2020