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| Defendant's deadline for serving expert disclosures under Fed. R. Civ. P. 26(a)(2). | 9/4/2024 |
| Deadline for disclosing any rebuttal expert disclosures. | 9/13/2024 |
| Deadline for completing discovery and filing any motion to compel discovery. <i>See</i> Fed. R. Civ. P. 37; <i>Middle District Discovery</i> (2021). | 10/4/2024 |
| Deadline for moving for class certification, if applicable. <i>See</i> Fed. R. Civ. P. 23(c). | N/A |
| Deadline for filing any dispositive and <i>Daubert</i> motion. <i>See</i> Fed. R. Civ. P. 56. (Must be at least five months before requested trial date.) | 10/25/2024 |
| Deadline for participating in mediation. <i>See</i> Local Rule. | 11/1/2024 |
| Date of the final pretrial meeting. <i>See</i> Local Rule 3.06(a). | 2/7/2025 |
| Deadline for filing the joint final pretrial statement, any motion in limine, proposed jury instructions, and verdict form. <i>See</i> Local Rule 3.06(b). (Must be at least seven days before the final pretrial conference.) | 2/21/2025 |
| Date of the final pretrial conference. <i>See</i> Fed. R. Civ. P. 16(e); Local Rule 3.06(b). | 3/7/2025 |
| Month and year of the trial term. | 4/1/2025 |

The trial will last approximately 4 days and will be

jury.

non-jury.

3. Description of the Action

Plaintiff has filed suit pursuant to 42 U.S.C §1983 claiming that Lake City Ordinance 2022-2220 (the "Ordinance"), both on its face and as applied to Plaintiff, violates its rights under the First Amendment to the U.S. Constitution.

Plaintiff contends that the Ordinance is unconstitutional because it infringes upon Plaintiff's First Amendment right to engage in solicitation on public property. Plaintiff seeks injunctive relief and damages.

4. Disclosure Statement

The parties have filed their disclosure statement as required by Federal Rule of Civil Procedure 7.1 and Local Rule 3.03.

5. Related Action

The parties acknowledge their continuing duty under Local Rule 1.07(c) to notify the judge of a related action pending in the Middle District or elsewhere by filing a "Notice of a Related Action." No notice need be filed if there are no related actions as defined by the rule.

6. Consent to a Magistrate Judge

The parties do consent and file with this case management report a completed Form AO 85 "Notice, Consent, and Reference of a Civil Action to a Magistrate Judge," which is [available on the Court's website](#) under "Forms."

The parties do not consent.

7. Preliminary Pretrial Conference

The parties do not request a preliminary pretrial conference before the Court enters a scheduling order.

The parties do request a preliminary pretrial conference, and the parties want to discuss ~~enter~~ discussion points.

8. Discovery Practice

The parties confirm they will comply with their duty to confer with the opposing party in a good faith effort to resolve any discovery dispute before filing a motion. *See* Local Rule 3.01(g); *Middle District Discovery* (2021) at § I.A.2.

9. Discovery Plan

The parties submit the following discovery plan under Rule 26(f)(2):

A. The parties agree to the timing, form, or requirement for disclosures under Rule 26(a):

Yes.

No; instead, the parties agree to these changes: enter changes.

B. Discovery may be needed on these subjects: all subjects arising out of the amended complaint and any defenses raised.

C. Discovery should be conducted in phases:

No.

Yes; describe the suggested phases.

D. Are there issues about disclosure, discovery, or preservation of electronically stored information?

No.

Yes; describe the issue(s).

E. The parties have considered privilege and work-product issues, including whether to ask the Court to include any agreement in an order under Federal Rule of Evidence 502(d).

F. The parties stipulate to changes to the limitations on discovery imposed under the Federal Rules of Civil Procedure and Local Rule 3.04 or other limitations:

No.

Yes; describe the stipulation.

10. Request for Special Handling

- The parties do not request special handling.
- The parties request special handling. Specifically, describe requested special handling.
- Enter party's name unilaterally requests special handling. Specifically, describe requested special handling.

11. Certification of familiarity with the Local Rules

- The parties certify that they have read and are familiar with the Court's Local Rules.

12. Signatures

Respectfully submitted,

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By: /s/ Andrew Udelsman
Andrew Udelsman

Date: May 15, 2024

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By: /s/ Susan Erdelyi

Date: May 15, 2024

Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed today, May 15, 2024, the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all persons registered to receive electronic notifications for this case, including all counsel.

By: /s/Andrew Udelsman
Andrew Udelsman