

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAN MCCONCHIE, in his official capacity as
Minority Leader of the Illinois Senate and
individually as a registered voter, *et al.*,

Plaintiffs,

v.

IAN K. LINNABARY, *et al.*,

Defendants.

Case No. 1:21-cv-03091

Circuit Judge Michael B. Brennan
Chief District Judge Jon E. DeGuilio
District Judge Robert M. Dow, Jr.

Three-Judge Court
Pursuant to 28 U.S.C. § 2284(a)

Magistrate Beth W. Jantz

JULIE CONTRERAS, *et al.*,

Plaintiffs

v.

ILLINOIS STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Case No. 1:21-cv-03139

Circuit Judge Michael B. Brennan
Chief District Judge Jon E. DeGuilio
District Judge Robert M. Dow, Jr.

Three-Judge Court
Pursuant to 28 U.S.C. § 2284(a)

Magistrate Beth W. Jantz

JOINT PROPOSED SCHEDULE

Plaintiffs Dan McConchie, in his official capacity as Minority Leader of the Illinois Senate and individually as a registered voter, Jim Durkin, in his official capacity as Minority Leader of the Illinois House of Representatives and individually as a registered voter, the Republican Caucus of the Illinois Senate, the Republican Caucus of the Illinois House of Representatives, the Illinois Republican Party, Plaintiffs James Rivera, Anna de La Torre, Dolores Diaz, Felipe Luna Jr., Salvador Tremillo, Christopher Romero, Plaintiffs Julie Contreras, Irvin Fuentes, Abraham Martinez, Irene Padilla, and Rose Torres (collectively

“Plaintiffs”), Defendants Emanuel Christopher Welch, Office of the Speaker of the Illinois House of Representatives, Don Harmon, and Office of the President of the Illinois Senate (collectively the “Leadership Defendants”) and Ian K. Linnabary, Casandra B. Watson, William J. Cadigan, Laura K. Donahue, Catherine S. McCrory, William M. McGuffage, and Rick S. Terven, Sr., in their official capacities as members of the Illinois State Board of Elections (collectively the “ISBE Defendants”) hereby respectfully request that this Court consider setting a schedule with the dates set forth below.

In support of this proposed schedule, the parties state as follows:

1. On October 9, 2021, Magistrate Judge Jantz requested the parties meet and confer to propose a schedule for the remaining dates in this litigation for the three-judge panel’s consideration.
2. The Illinois State Board of Elections reiterates its position as detailed in the Status Report filed on October 8, 2021.
3. After meeting and conferring, the parties, other than the Illinois State Board of Elections, jointly provide this Court with the following proposed schedule for its consideration:

EVENT	PROPOSED DATE
Fact Discovery Cutoff	October 29, 2021 (already set)
Exchange of Trial Witness List, Exhibit Lists and Stipulations	November 16, 2021 (already set)
Motions for Summary Judgment Due	November 17, 2021
Motions <i>In Limine</i> due	November 19, 2021
Responses to <i>Motion in Limine</i> due	November 22, 2021
Final Pre-Trial Conference and Submissions of Trial Exhibits and Designations	November 23, 2021
Motions for Summary Judgment Responses Due	November 24, 2021
Motions for Summary Judgment Replies Due	December 1, 2021
Proposed Trial Date	December 7, 2021

WHEREFORE, for the reasons set forth above, all parties respectfully request that the Court issue a schedule to the extent it deems appropriate with the proposed schedule set forth herein.

Dated: October 15, 2021

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