

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
BRIAN WRENN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 15-cv-00162 (CKK)
)	
DISTRICT OF COLUMBIA, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

JOINT DISCOVERY PLAN

The parties, Plaintiffs Brian Wrenn, Joshua Akery, Tyler Whidby, and the Second Amendment Foundation, and Defendants District of Columbia and Chief of Police Cathy Lanier, jointly submit this discovery plan pursuant to the Court's May 9, 2016, Scheduling and Procedures Order.

1. Exchange of Written Discovery, Documents and Other Materials: The parties will serve written discovery requests no earlier than July 15, 2016. The parties agree to produce privilege logs, if applicable, within 30 days of serving any production, unless the parties reach separate agreement allowing for additional time.

2. Protective Order: The parties do not anticipate requiring a protective order. If this position changes, the parties will notify the Court as soon as practicable should the need for a protective order arise.

3. Electronically Stored Information (ESI): The parties do not expect that discovery will involve substantial ESI.

4. Fact Witness Depositions: The parties agree to use their best efforts to reserve the period from October 3 through December 8, 2016, for depositions of fact witnesses. Both

parties reserve the right to use the full discovery period provided by the Court's Scheduling and Procedures Order, if necessary. Each party agrees that it will provide the other party with all proposed Rule 30(b)(6) deposition topics at least 30 days before any deposition noticed under that Rule.

5. Identification of Experts & Expert Depositions: The parties agree to use their best efforts to complete the depositions of expert witnesses between November 1 and December 8, 2016. The parties further agree to strive to schedule these depositions on dates convenient for them and their experts.

Respectfully submitted,

Dated: May 20, 2016

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