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June 19, 2015

**BY ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1610  
New York, New York 10007

Re: *DNAML PTY, Limited v. Apple Inc., et al.*, No. 13 Civ. 6516 (DLC)  
*Diesel eBooks, LLC v. Apple, Inc. et al.*, 14 Civ. 1768 (DLC)  
*Abbey House Media, Inc. v. Apple, Inc. et al.*, 14 Civ. 2000 (DLC)

Dear Judge Cote,

On behalf of Defendants in the above actions and pursuant to the telephonic conference with the Court on June 9, 2015, we write to inform the Court that we have come to an agreement with all Plaintiffs regarding a revised discovery and briefing schedule for all cases. The proposed revised schedule, which includes dates for fact discovery related to Defendants' counterclaims against Diesel and the resolution of the DNAML discovery dispute, is included in the table below.

Respectfully submitted,

/ C. Scott Lent /

C. Scott Lent  
Arnold & Porter LLP

Cc: Counsel of Record (via ECF Notification)

The Honorable Denise L. Cote

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**Revised Schedule**

The schedule below modifies and supersedes the schedule attached to the Joint Initial Report dated September 4, 2014, *DNAML* Dkt. 91. The schedule of all cases shall continue to be coordinated.

#	Action	Date/Deadline
1	Neutral forensic expert provides the entire Stage 3.1 Initial Report to all parties in 4402 Projection Dispute	As soon as possible (expected before July 1, 2015)
2	Discovery requests served for Diesel counterclaims	June 19, 2015
3	Diesel answers counterclaims	June 26, 2015
4	Parties serve responses and objections to discovery requests and commence producing documents responsive to discovery requests for Diesel counterclaims	July 20, 2015
5	4402 Projection Dispute motions filed	Thirty days after Defendants receive the entire Stage 3.1 Initial Report from neutral expert
6	4402 Projection Dispute oppositions filed	14 days after motions filed
7	Plaintiffs' rebuttal expert reports served (all cases)	August 11, 2015
8	Close of Diesel counterclaim fact discovery	August 28, 2015
9	End of expert discovery, including expert depositions (all cases)	August 28, 2015
10	Summary judgment motions filed (all cases)	September 18, 2015
11	Summary judgment motion oppositions filed (all cases)	October 16, 2015
12	Summary judgment motion replies filed (all cases)	October 30, 2015

DATED: June \_\_\_, 2015

**SO ORDERED:**


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 HON. DENISE L. COTE  
 United States District Judge