From: Kappers, Robert
Sent: Wednesday, January 29, 2025 7:46 PM
To: Thomas, David J.
Cc: SJ AAM Team; Brown, Lisa; szeller@dykema.com; Huget, J. Michael; Abdelnour, Dennis J.; Waidelich, Sarah E.
Subject: RE: Rule 26(f) Conference and Joint Discovery Plan

Thanks, David.

We are available on Friday at 1:30pm ET for the Rule 26(f) conference. Please circulate an invite. We will follow-up with our edits to the draft scheduling order and discovery plan.

Best,
Robert

From: Thomas, David J. <DThomas@honigman.com>
Sent: Tuesday, January 28, 2025 1:01 PM
To: Kappers, Robert <rkappers@steptoe.com>
Cc: SJ AAM Team <sjaamteam@Steptoe.com>; Brown, Lisa <LBrown@dykema.com>; szeller@dykema.com; Huget, J. Michael <MHuget@honigman.com>; Abdelnour, Dennis J. <DAbdelnour@honigman.com>; Waidelich, Sarah E. <SWaidelich@honigman.com>
Subject: [EXTERNAL] RE: Rule 26(f) Conference and Joint Discovery Plan

Robert,

Attached please find a draft scheduling order. We left placeholders in Exhibit B for you to complete.

For the Rule 26(f) conference, we are available this week on Thursday after 1:30 ET and on Friday from 11–noon or 1:30–4.

Regards,
David

David J. Thomas

HONIGMAN LLP
O 248.566.8642
M 248.762.3325
dthomas@honigman.com

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please delete it and notify the sender of the error.

From: Kappers, Robert <rkappers@steptoe.com>
Sent: Monday, January 20, 2025 3:40 PM
To: Huget, J. Michael <MHuget@honigman.com>; Abdelnour, Dennis J. <DAbdelnour@honigman.com>; Waidelich,

Sarah E. <SWaidelich@honigman.com>; Thomas, David J. <DThomas@honigman.com>; Jones-former, Andre <AJones2@honigman.com>
Cc: SJ AAM Team <sjaamteam@Steptoe.com>; Brown, Lisa <LBrown@dykema.com>; szeller@dykema.com
Subject: Rule 26(f) Conference and Joint Discovery Plan

[EXTERNAL EMAIL]

Counsel,

The Court ordered the parties to comply with Rule 26(f) and submit a joint discovery plan by February 3, 2025. Please provide a draft joint discovery plan at your earliest convenience and let us know when you are available to discuss. We propose that the parties follow a schedule consistent with those entered by courts in the District of Delaware. Form scheduling orders for each judge are available on the District's website.

Best,
Robert

Robert F. Kappers
Partner

Steptoe

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