

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NATERA, INC.,

Plaintiff,

v.

1:23-CV-629

NEOGENOMICS LABORATORIES,
INC.,

Defendant.

**JOINT STIPULATION AND ORDER REGARDING
DEPOSITION LIMITS**

Plaintiff Natera, Inc. and Defendant NeoGenomics Laboratories, Inc. have met and conferred to resolve the Parties' dispute identified in the Joint Interim Status Report regarding deposition limits. Doc. 382 at 6. The Parties have come to an agreement for the efficient completion of depositions in this case, and hereby provide the following Stipulation for the Court's consideration and entry memorializing the agreement.

1. Rule 30(b)(6) Depositions: Each Party may take up to 16 hours of testimony pursuant to Fed. R. Civ. P. 30(b)(6). If any witness is designated to testify under Rule 30(b)(6) and also sought for testimony under Rule 30(b)(1), that witness will not be subjected to more than 7 hours total of questioning. These depositions will be completed in advance of the upcoming April 4, 2025 deadline for completion of fact discovery. Doc. 330 (citing Doc. 326 at 3 n.4); Doc. 345 at ¶5.

2. Rule 30(b)(1) Or Rule 45 Witnesses: Each party may take individual depositions of five fact witnesses pursuant to Rule 30(b)(1) or Rule 45, including non-party witnesses.

These depositions will be completed in advance of the upcoming April 4, 2025 deadline for completion of fact discovery. *Id.*

3. Expert Witnesses: Each Party is permitted to depose any expert witness who is designated by the opposing party and serves a report during expert discovery. These depositions will be completed during the expert discovery period and in advance of the current June 6, 2025 expert discovery deadline. *Id.*

4. Additional Depositions Before Trial: Consistent with this Court's prior Order, any witness identified on a Party's trial witness list ("will call" or "may call") who has not already been deposed either individually or as a 30(b)(6) representative may be deposed before trial. Doc. 282 at ¶9. The Parties will work together to schedule any such deposition sufficiently in advance of trial.

IT IS SO STIPULATED.

Respectfully submitted, this 5th day of March, 2025.

By: /s/ Robert C. Van Arnam

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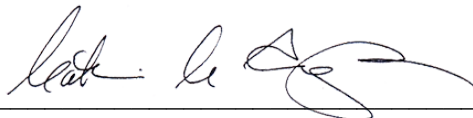
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PURSUANT TO STIPULATION, IT IS SO ORDERED this 6th day of March, 2025.



CHIEF/SENIOR UNITED STATES DISTRICT JUDGE