

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

GREGORY GREENE, JOSEPH LACK, and ANTHONY MOTTO, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MIZUHO BANK, LTD., a Japanese financial institution, and MARK KARPELES, an individual,

Defendants.

Case No. 1:14-cv-01437

Hon. Gary Feinerman

Magistrate Judge Susan Cox

JOINT STATUS REPORT

Plaintiffs Gregory Greene, Joseph Lack, and Anthony Motto (“Plaintiffs”) and Defendant Mizuho Bank, Ltd. (“Defendant,” and collectively the “Parties”), in accordance with the Court’s July 21, 2016 Order (Dkt. 227), collectively submit this joint status report to inform the Court of their proposed scheduling deadlines. The Parties’ proposed scheduling deadlines are as follows:

EVENT	PROPOSED DEADLINE
Deadline for Plaintiff to File a Motion to Amend the Complaint	<p>Plaintiffs’ Position: May 31, 2017</p> <p>Defendant’s Position: September 15, 2016 or 15 days after the Court issues the order on the pending motion to dismiss (whichever is later)</p>
Deadline for Defendant to Answer the Complaint	<p>Plaintiffs’ Position: 30 days after the Court issues the order on the pending motion to dismiss</p> <p>Defendant’s Position: If Plaintiff does not file a motion to amend the complaint, then October 5, 2016 or 30 days after the Court issues the order on the pending motion to dismiss (whichever is later). If Plaintiff files a motion</p>

	to amend the complaint, then 15 days after the Court rules on the motion to amend
Deadline to Complete Fact Discovery (both class and merits)	August 31, 2017 (12 months)
Plaintiff's Deadline to Disclose Expert Witnesses and File Expert Reports	September 15, 2017
Defendant's Deadline to Disclose Rebuttal Expert Witnesses and File Rebuttal Expert Reports	November 1, 2017
Deadline to Complete Expert Discovery	December 15, 2017
Plaintiff's Deadline to File for Class Certification	December 15, 2017
Defendant's Deadline to Oppose Class Certification	February 1, 2018
Plaintiff's Deadline to File Reply in Support of Class Certification	March 1, 2018
Deadline to File Dispositive Motions	Eight weeks after receipt of Court's order on Class Certification

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Respectfully submitted,

GREGORY GREENE, JOSEPH LACK, and ANTHONY MOTTO, individually, and on behalf of a class of similarly situated individuals,

Dated: August 23, 2016

By: /s/ Benjamin S. Thomassen

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MIZUHO BANK, LTD.

Dated: August 23, 2016

By: /s/ Jeffrey J. Rsetaritis
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CERTIFICATE OF SERVICE

I, Benjamin S. Thomassen, an attorney, hereby certify that I served the foregoing ***Joint Status Report***, by causing true and accurate copies of such paper to be transmitted to all counsel of record via the Court's CM/ECF electronic filing system on August 23, 2016.

/s/ Benjamin S. Thomassen