

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

Superior Court for Suffolk County

Ronald Geddes, AC, and RAR,
on their own behalf and
on behalf of a class of similarly situated
individuals,

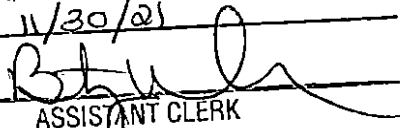
Plaintiffs,

v.

City of Boston; Boston Police Department;
Boston Public Health Commission; Kim M.
Janey, in her capacity as the Mayor of the City of
Boston and individually; Gregory P. Long, in his
Capacity as the Acting Commissioner of the
Boston Police Department and individually; and
Bisola Ojikutu, in her capacity as Executive
Director of the Boston Public Health Commission
and individually,

Defendants.

Civil Action No. 2184CV2609
On transfer by Second Interim Order in
SJ-2021-0408

SUFFOLK, ss. SUPERIOR COURT DEPT
(date) 11/30/21
FILED 
ASSISTANT CLERK

**PLAINTIFFS' PROPOSED TRACKING ORDER AS TO PROCEEDINGS ON
REMAND AND TRANSFER FROM SUPREME JUDICIAL COURT FOR
SUFFOLK COUNTY
IN SJ-2021-0408**

In light of the need for a full, fair, and expeditious resolution of this case, Plaintiffs hereby respectfully propose the following tracking order be established pursuant to Superior Court Standing Order 1-88 B.2. Plaintiffs note their expectation that discovery will commence immediately and continue up until the deadlines proposed below to facilitate such resolution and the instruction of the Single Justice that factual development proceed "forthwith."

Motions under MRCP 12, 15, 19, and 20		
Motions under MRCP 12, 19, and 20	Served by	January 13, 2022
	Opposition Served By	February 3, 2022
	9A Package Filed, along with any Reply By	February 13, 2022

	Heard By	March 13, 2022
Motions under MRCP 15	Served By	March 31, 2022 or 7 days after decision on any Rule 12 motions
	Opposition Served By	21 days after service
9A Package Filed, along with any Reply By		10 days after Oppositions served
	Heard By	30 days after 9A Package filed
Discovery Dates and Deadlines		
All Non-expert Discovery completed		May 16, 2022 (subject to modification by the Court in the event of any motions to compel)
Opening Expert Reports Served		June 3, 2022
Responsive Expert Reports Served		June 13, 2022
Expert Discovery Complete		July 7, 2022 (subject to modification by the Court in the event of any motions to compel)
Class Certification Dates and Deadlines		
Class Certification Motion and Memorandum of Law in Support to be Served		June 3, 2022
Opposition to Class Certification Motion Served		June 24, 2022
Class Certification 9A Package Filed, Along with any Reply Brief		July 7, 2022
Class Certification Motion Heard By		August 7, 2022
Dispositive Motions Dates and Deadlines		
All dispositive motions	Served By	August 12, 2022
	Opposition Served By	September 2, 2022
9A Package Filed, along with any Reply By		September 13, 2022
	Heard By	October 13, 2022

Dated: November 29, 2021

Respectfully submitted,

/s/ Kevin S. Prussia

Matthew R. Segal (BBO #654489)
Ruth A. Bourquin (BBO #552985)
Jessie J. Rossman (BBO #670685)
Jessica J. Lewis (BBO #704229)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS, INC.
211 Congress Street
Boston, MA 02110

Kevin S. Prussia (BBO #666813)
Arjun K. Jaikumar (BBO #691311)
Justin R. Metz (BBO #705658)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000

(617) 482-3170

Fax: (617) 526-5000
kevin.prussia@wilmerhale.com
arjun.jaikumar@wilmerhale.com
justin.metz@wilmerhale.com

Brittany R. Warren (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Tel: (202) 663-6772
Fax: (202) 663-6363
brittany.warren@wilmerhale.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2021, I served a true and correct copy of the above document via electronic mail upon all counsel of record in the above-referenced matter.

/s/ Kevin S. Prussia
Kevin S. Prussia

