

**IN RE: CAPITAL ONE CONSUMER
DATA SECURITY BREACH LITIGATION**

MDL No. 2915

In re: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

TIMELINE

1:19md2915 (AJT/JFA)

Seq.	Action	Date	Para(s).¹
1	Defendants file proposed lawyer for Defendants' Lead Counsel	within 7 days of Order	4
2	File applications for Plaintiffs' Lead Counsel/Steering Committee	Monday, November 18, 2019	3(a)
2	File applications for Defendants' Lead Counsel (if not agreed)	Monday, November 18, 2019	4
3	File objections to appointment of any Lead Counsel applicants	Monday, November 25, 2019	3(a)
4	Defendants' Lead Counsel to file list of all pending state court cases	within 14 days of appointment	4
5	Defendants' Lead Counsel to move for entry of proposed protective order	Tuesday, December 10, 2019	11
5	Lead Counsel (both) to file report re: representative motions to dismiss (if any)	Tuesday, December 10, 2019	13
5	Each plaintiff's counsel and Defendants' Lead Counsel to identify to Plaintiffs' Lead Counsel any outstanding motions still requiring a ruling (other than to dismiss or for discovery)	Tuesday, December 10, 2019	14
6	Plaintiffs' Lead Counsel to file response to defendants' motion for protective order	Tuesday, December 17, 2019	11
6	Lead Counsel to confer and file statement re: answering a representative complaint	Tuesday, December 17, 2019	13
6	Plaintiffs' Lead Counsel to file list of outstanding motions (other than to dismiss or for discovery) requiring a ruling	Tuesday, December 17, 2019	14
7	Lead Counsel to exchange proposed discovery plans	Friday, December 20, 2019	10(b), (c)
8	Any other counsel may file objections or comments to Lead Counsel's statement re: answering a representative complaint.	Monday, December 23, 2019	13
9	Lead Counsel to file (jointly if possible) statement re: case classification	Monday, January 6, 2020	12
10	Lead Counsel to file stipulation re: protocol for depository	Friday, January 10, 2020	9
10	All counsel to file any objections to <i>ex parte</i> meetings w/counsel at Initial Status Conf.	Friday, January 10, 2020	6
10	Lead Counsel to submit agenda items for discussion at Initial Status Conf.	Friday, January 10, 2020	7(b)

¹ Paragraph reference corresponds to paragraphs in Initial Pretrial Order #1 [Case No. 1:19-md-2915, Doc. 3].

10	Defendants' Lead Counsel to file report on the extent of agreement re: proposed protective order	Friday, January 10, 2020	11
11	Defendants' Lead Counsel to file report re: pending securities, derivative, regulatory or criminal actions or proceedings	Monday, January 13, 2020	4
11	Lead Counsel to file (jointly if possible) proposed litigation schedule	Monday, January 13, 2020	8
11	Lead Counsel to file statement re: unresolved objections to opposing party's discovery plan	Monday, January 13, 2020	10(d)
11	Any other counsel to file objections/comments to Lead Counsel's filings re: case classification	Monday, January 13, 2020	12
12	Lead Counsel to file respective protocols or statement of any disagreement re: document depository	Tuesday, January 14, 2020	9
13	Any other counsel to submit suggested items to discuss at Initial Status Conf.	Wednesday, January 15, 2020	7(b)
13	Any other counsel to file objections to Lead Counsel's proposed protective order	Wednesday, January 15, 2020	11
14	Any other counsel to file objections to Lead Counsel's proposed litigation schedule, proposed depository protocols, or proposed discovery plans	Friday, January 17, 2020	8; 9; 10(d)
15	Initial Status and Rule 16(b) Confs.	Tuesday, January 21, 2020	3(a), (b); 4; 7(a); 8