

IN THE CIRCUIT COURT OF THE CITY OF SAINT LOUIS
STATE OF MISSOURI

Ruby Freeman and Wandrea Moss,

Plaintiff(s)/Counterclaim
Defendant(s),

v.

James Hoft, Joseph Hoft, and TGP
Communications LLC d/b/a *The Gateway
Pundit*,

Defendant(s)/Counterclaim
Plaintiff(s).

Case No. 2122-CC09815-01

FILED
FEB 28 2024

22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

SCHEDULING ORDER

Trial

1. As set by the Presiding Judge, this case has a peremptory setting for a (10) ten-day jury trial commencing on **March 10, 2025**, at 9:00 a.m. Voir dire of the jury venire shall begin on **March 7, 2025**.

Pre-trial Conference

2. A pre-trial conference will be held on **February 24, 2025**, at 9:00 a.m.
3. By the pre-trial conference, the parties will provide the following to the Court:
 - a. A list of witnesses and exhibits.
 - b. One complete set of proposed jury instructions with supporting citations.
 - c. An electronic copy of all proposed jury instructions with supporting citations.
 - d. Any trial briefs.

Witness and Exhibits Lists

4. The parties shall exchange a list of trial witnesses and trial exhibits by **January 20, 2025**.
5. Objections to witnesses or exhibits shall be heard and argued at the pre-trial conference.

Deposition Designations

6. Any deposition testimony designations by page and line to be used at trial by an asserting party shall be identified and served to a defending party by **January 17, 2025**.
7. The opposing party shall serve counter-designations in a contrasting color and objections to the asserting party's designations by **January 31, 2025**.
8. Objections to counter-designations shall be served to the asserting party by **February 14, 2025**.
9. All objections to all deposition designations shall be presented to the Court, argued, and heard at the pre-trial conference.

Motions in Limine

10. All motions in *limine* shall be filed by **February 3, 2025**.
11. All oppositions to motions in *limine* shall be filed by **February 17, 2025**.
12. Motions in *limine* shall be argued and heard at the pretrial conference.

Dispositive Motions

13. All dispositive motions shall be filed by **September 27, 2024**.
14. Oppositions to dispositive motions shall be filed by **October 25, 2024**.
15. Replies in further support of dispositive motions shall be filed by **November 15, 2024**.
16. A hearing on any dispositive motions shall be held on, or around, **November 20** or **December 4, 2024**, consistent with the Court's schedule.

Experts Witnesses

17. The parties shall identify and disclose all expert witnesses whom they may call to testify at trial on matters for which they have the burden of proof no later than **May 28, 2024**, including a report prepared by the expert witness containing a complete statement of all opinions the witness will express, the basis and reasons for them, all facts or data considered by the witness in forming the expert witness's opinions, and any exhibits that will be used to summarize or support the witness's opinions.
18. The parties shall identify and disclose all rebuttal expert witnesses whom they may call to testify at trial no later than **June 28, 2024**, including a report prepared by the expert witness containing a complete statement of all opinions the witness will express, the basis and reasons for them, all facts or data considered by the witness in forming the expert witness's opinions, and any exhibits that will be used to summarize or support the witness's opinions.
19. The parties shall identify and disclose all reply expert witnesses whom they may call to testify at trial in reply to any rebuttal expert's opinion, no later than **July 19, 2024**, including a report prepared by the expert witness containing a complete statement of all opinions the witness will express in reply to any opinion disclosed by a rebuttal expert, the basis and reasons for said opinions, all facts or data considered by the witness in forming the expert witness's opinions, and any exhibits that will be used to summarize or support the witness's opinions.
20. The parties shall produce for deposition, between the dates of **August 5, 2024**, and **August 16, 2024**, inclusive, all expert witnesses whom they may call to testify at trial on matters for which they have the burden of proof, including on the topic(s) contained within any reply for such expert witnesses.

21. The parties shall produce for deposition, between the dates of August 19, 2024, and August 30, 2024, inclusive, all rebuttal expert witnesses.
22. All challenges to any expert witness shall be filed by September 27, 2024. Oppositions to such challenges shall be filed by October 25, 2024. Replies in further support of such challenges shall be filed by November 15, 2024. A hearing on any challenges to expert witnesses shall be held on, or around, November 20 or December 4, 2024, consistent with the Court's schedule.

Discovery

23. Fact discovery should be completed by May 31, 2024, ~~April 29, 2024~~, excluding any discovery in connection with Mo. Ann. Stat. § 510.263(8).

24. All discovery shall be completed by Sept. 10, 2024.

Miscellaneous

26. The dispositive motion date, pretrial date, pre-trial conference date and trial dates shall be changed only by leave of Court. Any other time deadlines may be changed by a written agreement of the parties without notice to the Court, as long as such changes do not affect the trial date. Any desire to make changes without the agreement of the parties will require leave of Court.

IT SO ORDERED:



Dated: February 28, 2024