EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA EASTERN DIVISION

RODNEY D. PIERCE, et al.,

Plaintiffs,

Case No. 4:23-cv-193-D

v.

THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *et al.*,

Defendants.

[PLAINTIFFS' PROPOSED] SCHEDULING ORDER

Unless otherwise modified by this Court, the following deadlines shall apply in the above-

captioned matter:

- 1. Parties to conduct Rule 26(f) conference: April 12, 2024
- 2. Deadline to exchange Rule 26(a) initial disclosures: April 26, 2024
- 3. Deadline for all parties' opening expert reports: May 31, 2024
- 4. Deadline for all parties' responsive expert reports: July 12, 2024
- 5. Deadline for all parties' reply expert reports: August 2, 2024
- 6. Deadline for all parties' sur-reply expert reports: **August 16, 2024** (a party may only submit a sur-reply report if an opposing party submits a reply report by a new expert)
- 7. Deadline to complete expert depositions: August 30, 2024
- 8. Deadline to complete all discovery: August 30, 2024
- 9. Deadline to file dispositive motions/motions in limine, if any: September 20, 2024

- Deadline to respond to dispositive motions/motions in limine, if any: October 4, 2024
- 11. Deadline to reply to dispositive motions/motions in limine, if any: October 11, 2024
- 12. Deadline to exchange pretrial disclosures required under FRCP 26(a)(3): October
 18, 2024
- 13. Deadline to exchange any objections listed in FRCP 26(a)(3): October 25, 2024
- 14. Deadline to file final pretrial order: November 1, 2024
- 15. Final pretrial conference: Week of November 18 or 25, 2024, or at the Court's convenience
- Simultaneous exchange of supplemental racially polarized voting reports with data from November 2024 election: November 25, 2024
- 17. Trial: Starting December 2, 2024 (lasting no more than 5 days)
- Deadline to file proposed findings and fact and conclusions of law: three weeks after the conclusion of trial.