

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Consumer Vehicle Driving Data
Tracking Collection

CIVIL ACTION FILE No.
1:24-MD-3115-TWT

**[PROPOSED] AGENDA FOR STATUS CONFERENCE
ON OCTOBER 18, 2024**

The parties submit the following agenda topics for the initial conference scheduled for October 18, 2024, at 10:00 a.m.:

A. Joint Agenda Topics – The Parties agree to address the following issues at the October 18, 2024, Status Conference:

1. Joint Proposed Report and Discovery Plan (Pursuant to Fed. R. Civ P. 26, Local Rule 16.2 and CMO #1).

a. The Parties' Position on the Proposed Schedule

- i. Plaintiffs' position on scheduling and proposed schedule
- ii. Defendants' position on scheduling and Defendants' scheduling option 1 or, alternatively, option 2

b. Preliminary Discovery Issues

- i. Third-Party Document Preservation Subpoenas
- ii. Initial Discovery Orders
- iii. Plaintiffs' Request for Pre-Motion to Dismiss/Early Discovery

2. Update on any Potential Tag-Along Actions

3. Scheduling Subsequent Status Conferences

B. Disputed Agenda Topics – Plaintiffs will provide a summary of their position on the following issues because they impact several agreed agenda topics including the proposed schedule, preliminary discovery issues, and several case management issues. Defendants believe these topics are premature for the October 18, 2024, status conference.

1. **Subject Matter Jurisdiction, including potential related discovery.**
2. **Personal Jurisdiction, including potential related discovery.**
3. **Arbitration, including potential related discovery.**

Respectfully submitted: October 16, 2024.

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CERTIFICATE OF SERVICE AND TYPE SIZE COMPLIANCE

I certify that on this date I electronically filed the foregoing **PROPOSED AGENDA FOR STATUS CONFERENCE OF OCTOBER 18, 2024** with the Clerk of Court using the CM/ECF system which will automatically send email notification to all counsel of record. I further certify that the foregoing was prepared in Times New Roman, 14-point font, in compliance with Local Rule 5.1.

Dated: October 16, 2024.

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