

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: MOVEIT CUSTOMER DATA  
SECURITY BREACH LITIGATION

This Document Relates To:

MDL No. 1:23-md-03083-ADB-PGL

ALL CASES

**MDL Order No. 30**

**(Regarding Case Management Schedule for Discovery and Class Certification Briefing for  
Bellwether Parties)**

The Court hereby orders that the following case management schedule shall apply as to the  
Bellwether Parties.

**Discovery Schedule**

<b>Event</b>	<b>Proposed Deadline</b>
Deadline for Bellwether Parties to complete initial meet and confer conferences and either: (i) Agree on search terms and custodians for Bellwether Defendants as appropriate or (ii) Raise any disputes with Judge Levenson.	December 3, 2025  <i>One month after Nov. 3 Status Conference</i>
Deadline for rolling production of documents by Bellwether Defendants to begin.	January 5, 2026  <i>One month after deadline to raise disputes</i>
Deadline for Bellwether Parties to complete initial meet and confer conferences and raise any disputes about Plaintiffs' search terms with Judge Levenson.	December 18, 2025  <i>One month after responses/objections to RFPs due</i>

Event	Proposed Deadline
Deadline for production of documents by Bellwether Plaintiffs to begin.	January 20, 2026 <i>One month after deadline to raise disputes</i>
Bellwether Parties substantially complete document production.	April 30, 2026
Deadline to raise privilege disputes.  This is a backstop date; privilege motions may be made on a rolling basis. <sup>1</sup>	July 1, 2026  <i>30 days before the close of fact discovery</i>
Fact discovery closes.	July 31, 2026  <i>About 90 days after substantial completion of document production</i>

#### **Proposed Class Certification Briefing and Supporting Expert Discovery Schedule<sup>2</sup>**

Event	Proposed Deadline
Plaintiffs move for class certification and serve supporting expert reports. Alongside expert reports, Bellwether Plaintiffs shall provide three dates their experts are available for a deposition within the next 30 days.	August 28, 2026  <i>Four weeks after close of fact discovery</i>
Defendants oppose class certification and serve opposing expert reports in support. Alongside expert reports, Bellwether Defendants shall provide three dates their	October 30, 2026  <i>63 days after Plaintiffs move and serve expert reports</i>

<sup>1</sup> MDL Order No. 16 states “Interim privilege logs shall be produced on a rolling basis within 45 days of the date on which a Producing Party makes a production from which privileged materials have been withheld. Final privilege logs must be produced either (i) 60 days before the close of fact discovery or (ii) for logs containing a specific custodian’s withheld documents, at least 14 days before the deposition of the custodian.”

<sup>2</sup> The parties are continuing to meet and confer regarding the structure of class certification briefing and will submit a proposal at a later date.

Event	Proposed Deadline
<p>experts are available for a deposition within the next 30 days.</p> <p>Defendants file any Daubert motions on non-rebuttal experts.</p>	
<p>Plaintiffs file reply in further support of class certification and, if rebuttal experts are deemed necessary, serve rebuttal expert reports in support. Alongside rebuttal expert reports, Bellwether Plaintiffs shall provide three dates their rebuttal experts are available for a deposition within the next 30 days.</p> <p>Plaintiffs oppose Defendants' Daubert motions.</p> <p>Plaintiffs file any Daubert motions.</p>	<p>November 30, 2026</p> <p><i>31 days after Defendants move and serve expert reports</i></p>
<p>Defendants oppose Plaintiffs' Daubert motions.</p>	<p>December 30, 2026</p> <p><i>30 days after Plaintiffs file Daubert motions</i></p>

**SO ORDERED.**

January 20, 2026

/s/ Allison D. Burroughs  
ALLISON D. BURROUGHS  
U.S. DISTRICT JUDGE