UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

EXXON MOBIL CORPORATION, Plaintiff, v. CORPORACIÓN CIMEX, S.A., *et al.*, Defendants.	)	Civil Action No.: 19-1277 (APM)

[PROPOSED] ORDER

Upon consideration of Plaintiff's Consent Motion for Extension of Time and Entry of Scheduling Order, the Court issues the following Order:

1. The Motion is granted.

2. Plaintiff shall file an opposition to Defendants' Motion to Dismiss Action with Prejudice and for Other Relief (Dkt. Nos. 42 & 43) (the "Motion") no later than September 29, 2020. Defendants shall file a reply, if any, within forty-five (45) days from the filing and service of Plaintiff's opposition. The parties may advise the Court of their views with respect to the need *vel non* for jurisdictional discovery as to the Foreign Sovereign Immunities Act's jurisdictional immunities ("FSIA jurisdictional discovery") in the opposition and reply briefs, without need to make a motion for leave to take jurisdictional discovery.

3. To the extent that the Court's treatment or disposition of the Motion does not render their compliance with Rule 26(f) of the Federal Rules of Civil Procedure moot, the parties, consistent with any relevant rulings by the Court in its treatment or disposition of the Motion, shall: comply with Rule 26(f) with respect to FSIA jurisdictional discovery; and, pursuant thereto, meet and confer under Rule 26(f) within thirty (30) days of entry of the Court's

order on the Motion, and submit a discovery plan in accordance with Rule 26(f), with respect to FSIA jurisdictional discovery (including for the litigation of any objections by Defendants to, or with respect to, FSIA jurisdictional discovery).

4. Nothing in this Order, or Plaintiff's motion for or Defendants' consent to the entry of same, shall be construed to waive, limit or prejudice any party's rights, positions or arguments regarding: jurisdictional discovery; appeal from or petition for appellate review of the Court's order or orders on the Motion or otherwise; arguments pertaining to jurisdictional discovery that may be raised on appeal or appellate review; or any party's other rights, positions or arguments.

Dated: _____ _____

Hon. Amit P. Mehta
United States District Judge

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