



and are ripe for this Court's decision. Defendant also respectfully requests oral argument on all contested motions. An email with a link to access courtesy copies of all briefing on Defendant's motions will be sent contemporaneously with this filing. An outline of the documents filed and their date of filing is outlined below.

- **Defendant's MILs 1-10**

- Defendant's motion (712 D MIL No. 1-10 General Motions) was filed on January 17, 2023;
- Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023; and
- Defendant's reply (814 Reply in Support of D MIL 1-10) was filed on February 17, 2023.

- **Defendant's MIL 11**

- Defendant's motion (716 D MIL No. 11 Re Reptile and Golden Rule Arguments) was filed on January 17, 2023;
- Plaintiff's opposition (757 P Opp. to MIL 11) was filed on February 6, 2023; and
- Defendant's reply (819 Reply in Support of D MIL 11) was filed on February 17, 2023.

- **Defendant's MIL 12**

- Defendant's motion (718 D MIL No. 12 Rebuttal Witnesses) was filed on January 17, 2023;
- Plaintiff's opposition (772 P. Opp. to D MIL No. 12) was filed on February 6, 2023; and

- Defendant's reply (823 Reply in Support of D MIL No. 12) was filed on February 17, 2023.
- **Defendant's MILs 13-15**
  - Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
  - Plaintiff's opposition (756 P. Opp. to D MILs 13-15) was filed on February 6, 2023; and
  - Defendant's reply (824 Reply in Support of D MILs 13-15) was filed on February 17, 2023.
- **Defendant's MIL 16**
  - Defendant's motion (721 D MIL No. 16 Exclude Reference to Interactions Between Plaintiff and Defendants Counsel) was filed on January 17, 2023;
  - Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023; and
  - Defendant's reply (828 Reply in Support of D MIL 16) was filed on February 17, 2023.
- **Defendant's MIL 17**
  - Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
  - Plaintiff's opposition (Filed Privately by Plaintiff) was filed on February 6, 2023; and
  - Defendant's reply (Filed Privately by Defendant) was filed on February 17, 2023.
- **Defendant's MIL 18**

- Defendant's motion ( 732 D MIL No. 18 To Exclude Untimely Expert Reevaluations and Opinions Based on Records Not Disclosed or Untimely Disclosed to Defendant) was filed on January 17, 2023;
  - Plaintiff's opposition (770 P. Opp. to D MIL No. 18) was filed on February 6, 2023; and
  - Defendant's reply (840 Reply in Support of D MIL 18) was filed on February 17, 2023.
- **Defendant's MIL 19**
    - Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
    - Plaintiff's opposition (774 P Opp. to D MIL 19) was filed on February 6, 2023; and
    - Defendant's reply (841 Reply in Support of D MIL No. 19) was filed on February. 17, 2023
- **Defendant's MIL 20**
    - Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;
    - Plaintiff's opposition (766 P Opp. to D MIL No. 20) was filed on February 6, 2023; and
    - Defendant's reply (852 Reply in Support of D MIL 20) was filed on February 17, 2023.
- **Defendant's MIL 21**
    - Defendant's motion (Filed Privately by Defendant) was filed on January 17, 2023;

- Plaintiff's opposition (770 P Opp. to D MIL No. 21) was filed on February 6, 2023; and
- Defendant's reply (853 Reply in Support of D MIL 21) was filed on February 17, 2023.
- **Defendant's Response to Plaintiff's Claim that Identified Confidential Material is Not Subject to the Protective Order (Contained in Each of Plaintiff's Opposition Memoranda. (D 880; and Exhibits 1-4 881-884.)**

DATED this 23<sup>rd</sup> day of February, 2023.

**EPPERSON & OWENS, P.C.**

*/s/ Peter D. Jensen*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of February, 2023, a true and correct copy of **REQUEST TO SUBMIT FOR DECISION FOR DEFENDANT AND COUNTERCLAIMANT MS. PALTROW'S PRETRIAL MOTIONS (MILS 1-21)** was served and/or filed via the Court's e-filing and by e-mail transmission to counsel listed below.

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G:\SWO\Sanderson v. Paltrow\PLEADINGS [PROTECTIVE ORDER IN PLACE]\TRIAL MOTIONS\Our MILs\Req. to Submit and Req. for Oral Arg. (Our MILs).docx