



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

RENA A. KASTIS and JAMES E.	)	
CONROY,	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
WILLIAM A. CARTER et al.,	)	C.A. No. 8657-CB
	)	
Defendants.	)	

**[PROPOSED] ORDER**

Upon motion of Plaintiffs and for good cause shown, IT IS HEREBY ORDERED this \_\_\_ day of \_\_\_\_ that Plaintiffs Motion for Expedited Proceedings Concerning Hemispherx Biopharma, Inc.’s Fee-Shifting and Surety Bylaw is hereby GRANTED and Counts IV through VIII of the Amended Verified Complaint (“Amended Complaint”) shall be presented to the Court on the following schedule:

1. Plaintiffs are granted leave to file the Amended Complaint.
2. Defendants are directed to serve and file an answer or answers to the Amended Complaint within five (5) calendar days of this order.
3. The parties shall conduct discovery on an expedited basis;
4. Defendants shall respond to Plaintiffs’ Second Request for Production of Documents (the “Second Request”) and First Set of Interrogatories within ten (10) calendar days of service of those discovery requests;

5. Rolling production of Defendants' documents responsive to Plaintiffs' Second Request shall commence on or before September 5, 2014;

6. Defendants' document production and production of privilege logs in response to Plaintiffs' Second Request shall be completed on or before September 12, 2014;

7. All fact discovery, including deposition discovery, shall be completed on or before September 24, 2014;

8. Plaintiffs shall serve and file their opening brief on September 30, 2014;

9. Defendants shall serve and file their answering brief on October 8, 2014;

10. Plaintiffs shall serve and file their reply brief on October 14, 2014;  
and

11. A hearing on Plaintiffs' claims in Counts IV through VIII of the Amended Complaint will be held on October \_\_ - \_\_, 2014 commencing at \_\_\_\_ a.m. in Wilmington, Delaware.

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Chancellor Andre G. Bouchard