

JULY 7, 2021

VIA EMAIL TRANSMISSION

Judge M.C. Rodgers
United States District Court for the
Northern District of Florida
100 North Palafox St.
Pensacola, Florida 32502

Re: *In Re: 3M Combat Arms Earplug Products Liability Litigation, 3:19-md2885*

Dear Judge Rodgers,

Pursuant to Case Management Order 2, Section IV (Docket No. 452), Co-Lead Counsel for plaintiffs and Counsel for Defendants submit this joint letter setting forth the parties' agenda for the July 9, 2021, Case Management Conference.

- I. Early Vetting Subcommittee Update**
- II. Group B Trial Schedule & Start Dates**
 - a. Proposed Pretrial Schedule for Taylor (September Trial Setting)
 - b. Blum Dismissal/Open October Trial Setting
 - c. Proposed Consolidation of Taylor and Adkins Trials
 - d. Tentative January Trial Setting
- III. Status of Eighth Circuit Appeals of Remand Orders**
- IV. Interest on Trial Judgments (Estes, Hacker, Keefer and Baker)**
- V. Group C & Group D Trial Schedules and Plans**
- VI. Defendants' Cross-Notice of Remote Oral and Videotaped Deposition of Colonel (Ret.) Jay Vietas**
- VII. Future Trials and Early Discovery Cases**
 - a. Expansion (or creation) of New Pool of Early Discovery Cases
 - b. Trial Consolidation (Considerations for Grouping Certain Cases)
 - c. Potential for Remand Cases

Sincerely,

Bryan F. Aylstock,
Shelley Hutson, &
Chris Seeger

Plaintiffs' Co-Lead Counsel