

Bryan F. Aylstock (FL, AL, MS)*
Justin G. Witkin (FL, MS)
Douglass A. Kreis (FL)
Neil D. Overholtz (FL)
R. Jason Richards (FL, CO)
Bobby J. "Brad" Bradford (FL, AL)
Stephen H. Echsner (FL)
D. Renée Baggett (FL)
Daniel J. Thornburgh (FL, MN)
Nathan C. Bess (FL)



AYLSTOCK WITKIN KREIS OVERHOLTZ

www.AWKOLAW.com

17 East Main Street, Suite 200 • Pensacola, Florida 32502
Phone: (850) 202-1010 • Fax: (850) 916-7449

E. Samuel "Sam" Geisler (FL, IL)
Jennifer M. Hoekstra (LA)
James D. Barger (PA, NJ)
Chelsie R. Warner (MT, NV, WA)
S. Mary Liu (CA, FL)
Samantha M. Katen (FL, NC, CO)
Caitlyn P. Miller (FL, AL)
D. Nicole Guntner (NY)
Lydia T. Lucius (AL, MO, FL, NJ)
Marybeth Putnick (DE, NJ)†
† Of counsel

* States in which attorney is licensed to practice law

January 15, 2021

VIA EMAIL TRANSMISSION

Judge M.C. Rodgers
United State District Court for the
Northern District of Florida
100 North Palafox Street
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), Lead Counsel for plaintiffs and counsel for Defendants submit this joint letter setting forth the parties' agenda for the January 22, 2021, Case Management Conference.

1. Trial start date: March 29 Versus April 5
2. Trial clock
3. Juror questionnaire
4. Coronavirus protocol planning for trial
5. Pretrial Stipulations (parties to meet and confer)
6. Motion in Limine process (parties to meet and confer)
7. Protocol for Deposition Designations and Rulings (parties to meet and confer)
8. Government discovery update, including Trial Group C depositions
9. Bellwether discovery update
10. Expert depositions and scheduling
11. Group B Summary Judgement and Daubert motions (parties to meet and confer)
12. Scheduling of DMEs for Group C

Sincerely,

Bryan F. Aylstock