

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE: FRESENIUS
GRANUFLO/NATURALYTE DIALYSATE
PRODUCTS LIABILITY LITIGATION**

MDL NO. 1:13-md-2428-DPW

This Document Relates to:

All Cases

**[FMCNA DEFENDANTS' PROPOSED]
CASE MANAGEMENT ORDER NO. []**

(BELLWETHER DISCOVERY AND TRIAL DEADLINES)

The following deadlines shall apply to cases selected for bellwether trials pursuant to Case Management Order No. 10 (Bellwether Case Selection):

May 31, 2014	Production Certification of Completion served by FMCNA.
September 15, 2014	Lists of cases designated to undergo Core Case-Specific Discovery exchanged by the PEC and FMCNA simultaneously.
September 19, 2014	List of cases selected for Core Case-Specific Discovery submitted to the Court.
October 3, 2014	Core Case-Specific Discovery commences.
February 27, 2015	Core Case-Specific Discovery closes.
March 13, 2015	Lists of cases recommended for further pre-trial discovery and bellwether trials submitted to the Court.
April 1, 2015	Final pool of cases for further pre-trial discovery and bellwether trials selected by the Court.
April 10, 2015	Expert reports on matters of general liability/general causation disclosed by the PEC and FMCNA simultaneously.

April 24, 2015	Rebuttal expert reports on matters of general liability/general causation disclosed by the PEC and FMCNA simultaneously.
May 8, 2015	Depositions of general liability/general causation experts completed.
June 1, 2015	Fact Discovery completed. (The PEC and FMCNA shall agree upon the scope of remaining discovery or seek the Court's intervention.)
June 15, 2015	Case-specific expert reports disclosed by the Plaintiffs and FMCNA simultaneously.
July 6, 2015	Depositions of case-specific experts completed.
July 20, 2015	<i>Daubert</i> and other dispositive motions filed.
August 3, 2015	Oppositions to <i>Daubert</i> and dispositive motions filed.
August 24, 2015	First bellwether trial begins.
September 21, 2015	Second bellwether trial begins.

SO ORDERED this _____ day of _____, 2014.

DOUGLAS P. WOODLOCK, J.