

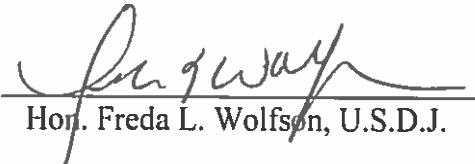
including but not limited to claims for lost wages;

- f. An executed copy of a substantially completed and responsive Plaintiffs' Fact Sheet (PFS); and
- g. Executed records authorizations and documents required by the PFS.

2. No sooner than sixty days after compliance with paragraph 1 of this Order, the parties will work to set deposition dates convenient for both sides. It is recognized, however, by all parties that the medical condition of the Plaintiff may warrant a more expedited schedule. In those instances, the parties shall agree on a mutually convenient date as soon as possible after such notice.

3. Defendants are entitled to take a discovery deposition of the Plaintiff before a trial preservation deposition is taken. The discovery deposition must occur at least 24 hours but no more than 72 hours prior to the *in extremis* deposition, which is limited to five (5) hours on the record without prejudice. The *extremis* deposition shall be limited to five (5) hours on the record without prejudice, unless the Plaintiff cannot physically proceed, with the time for direct and cross examination to be split by the parties 50/50.

4. In the event there is a case in which it is not feasible for Plaintiffs' counsel to meet the conditions set forth in paragraph 1 sixty days prior to the taking of an *in extremis* deposition, Plaintiffs' counsel shall consult with Defendants and, if necessary, the Court, prior to proceeding with the deposition.


Hon. Freda L. Wolfson, U.S.D.J.