

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:22-md-03036-RJC-DCK**

**IN RE: GARDASIL PRODUCTS LIABILITY
LITIGATION**

MDL No. 3036

**THIS DOCUMENT RELATES TO
ALL CASES**

JOINT PROPOSED AGENDA FOR OCTOBER 11, 2022, INITIAL CONFERENCE

Pursuant to the Court's First Pretrial Order, dated August 10, 2022, the parties jointly submit the following proposed Agenda for the Initial Conference on October 11, 2022:

- I. Introductions
- II. Whether There is a Need for Master Pleadings
- III. Deadlines for Amendment of Pleadings
 - a. Responsive Pleading Deadlines
- IV. Proposed Discovery Plan
- V. Scheduling of Post-Discovery Motions including *Daubert* and Dispositive Motions
- VI. Additional Matters
 - a. Proper Party Order
 - b. Waiver of Service
 - c. Direct Filing Order
 - d. Plaintiff Fact Sheet and Defendants' Fact Sheet Order
 - e. Protective Order

- f. ESI Order
- g. Science Day
- VII. Parties' Lead and Liaison Counsel Structure
 - a. Appointments of Lead Counsel and Liaison Counsel
 - b. The Need for a Plaintiffs' Steering Committee and/or State Court Liaison
- VIII. Dates for Future Conferences
- IX. Plan for Alternative Dispute Resolution

Date: September 20, 2022

/s/ Bijan Esfandiari (on behalf of Plaintiffs
with permission)

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Respectfully submitted,

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