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)
Bijan Esfandiari

BAUM HEDLUND ARISTEI & GOLDMAN P.C.

10940 Wilshire Blvd., Suite 1600

Los Angeles, CA 90024 Telephone: (310) 207-3233 Facsimile: (310) 820-7444

besfandiari@baumhedlundlaw.com

Respectfully submitted,

/s/ Allyson M. Julien
Allyson M. Julien

Proposed Co-Lead Counsel for Merck

GOLDMAN ISMAIL TOMASELLI BRENNAN & BAUM LLP 200 South Wacker Drive

22nd Floor

Chicago, IL 60606

Telephone: (312) 881-5968 Facsimile: (312) 881-5191 ajulien@goldmanismail.com

David E. Dukes

Proposed Co-Lead Counsel for Merck
NELSON MULLINS RILEY & SCARBOROUGH

LLP

1320 Main St., 17th Floor Columbia, SC 29201 Telephone: (803) 255-9451 Facsimile: (803) 256-7500 david.dukes@nelsonmullins.com

David C. Wright III

Proposed Liaison Counsel for Merck ROBINSON, BRADSHAW & HINSON P.A. 101 N. Tryon Street, Suite 1900

Charlotte, NC 28246

Telephone: (704) 377-8322 Facsimile: (704) 373-3922

dwright@robinsonbradshaw.com