

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**IN RE: HAIR RELAXING MARKETING
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION**

MDL No. 3060

Master Docket No. 1:23-cv-00818

Hon. Mary M. Rowland

**PARTIES' JOINT MOTION FOR AN EXTENSION OF TIME TO SUBMIT
COMPETING BELLWETHER PROTOCOLS AND RELATED BRIEFING**

The Parties hereby jointly move the Court for an extension of time to file their respective Bellwether Protocols and related briefing. In support of this motion, the Parties state as follows:

1. Pursuant to the Court's initial scheduling order, set forth in Case Management Order No. 6 (ECF No. 168), the Parties were ordered to meet and confer on a plan for moving cases towards trial, including a plan to select representative cases to serve as bellwether cases to undergo additional discovery. The order further required the parties to submit this proposed plan via a proposed case management order.

2. The Parties were not able to reach agreement and thus the Parties submitted competing Bellwether Protocol on November 11, 2023. (*See* ECF No. 289; ECF No. 290.)

3. On November 15, 2023, this Court issued a minute order extending the time for the Parties to confer about the Bellwether Protocol. (ECF No. 295.) Pursuant to that order, "Parties should submit a Bellwether Protocol (agreed or competing)" by December 11, 2023. (*Id.*). Following this order, the Parties continued to meet and confer but have determined that they are unable to reach agreement.

4. Instead, the Parties have agreed to submit simultaneous, competing Bellwether Protocols and supporting briefs, with the briefs not to exceed fifteen (15) pages.

5. Given the meet and confer process and in order to give the Parties adequate time to prepare these submissions, the Parties have agreed to a one-week extension to submit their Bellwether Protocols and their briefs of up to fifteen (15) pages.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion for a one-week extension of time to file their respective Bellwether Protocols and related briefing such that the new deadline to file the competing Bellwether Protocols will be December 18, 2023.

Dated: December 7, 2023

Respectfully submitted,

/s/ Edward A. Wallace

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