

**EXHIBIT F**  
**MODEL DISCOVERY SCHEDULE**  
**MONTHLY FIFO TRIAL CLUSTERS**

- P =** Date of publication of the trial groups  
Two October's prior to the relevant year; Amended Case Management Order  
("CMO") XIV.D.1).
- I =** Last day for plaintiffs to serve disclosure responses
- T =** Trial Date

**DATE DUE**

**ACTIVITY TO BE COMPLETED**  
**NO LATER THAN DATE DESIGNATED**

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|--------------------------|---|
| <b>P</b>                 | Publication of trial groups and discovery schedules (CMO XIV.D.1).  |
| <b>P + 30 days</b>       | Plaintiffs to provide to defendants list of remaining defendants in each case (CMO XIV.D.1).  |
| <b>P + 37 days</b>       | Defendants identify discovery and medical liaison counsel for each trial group by this date (CMO XIV.B).  |
| <b>P + 45 days</b>       | Defendants respond to plaintiffs' list of remaining defendants.   |
| <b>I (T - 11 months)</b> | Plaintiffs to serve answers to defendants' interrogatories, responses to defendants' requests for production of documents, and provide properly executed document authorizations to the relevant record retrieval services. |
| <b>I + 10 days</b>       | Commencement of initial settlement conferences (CMO XIV.E.1).   |
| <b>I + 17 days</b>       | Selection of sixteen (16) Trial Preparation Cases by the NYCAL Special Master/Referee (CMO XIV.C.1).  |
| <b>I + 30 days</b>       | Plaintiffs to publish revised list of remaining defendants.   |
| <b>I + 90 days</b>       | Plaintiffs to serve product identification interrogatories.   |

I + 120 days	Plaintiffs and key fact witnesses in death cases must be produced for deposition.
T - 5 months	Plaintiffs to serve expert witness reports on remaining defendants.
T - 4.5 months	Plaintiffs to deliver all pathology and radiology materials to defense medical liaison counsel.
T - 4 months	Defendants to serve answers to plaintiffs' product identification interrogatories and responses to plaintiffs' requests for production of documents.
T - 3.5 months	Plaintiffs to serve fact and expert witness lists.
T - 3 months	Defendants to file third-party complaints; depositions of plaintiff's fact witness must be completed.
T - 11 weeks	Defendants to serve fact witness lists.
T - 8 weeks	Depositions of defendants' fact witnesses to be completed.
T - 7 weeks	Independent medical examinations of the plaintiffs to be completed.
T - 21 days	Defendants to serve expert witness reports; plaintiffs to serve their exhibit lists.
T - 19 days	Defendants to serve expert witness lists.
T - 14 days	Trial groups selected (CMO XIV.C.1). Defendants to serve exhibit lists.
T - 7 days	Final pre-trial and settlement conference.
T	Jury selection commences; depositions of expert witnesses to be completed.