

EXHIBIT G
MODEL DISCOVERY SCHEDULE
ACCELERATED TRIAL CLUSTERS

D = Date of designation of cases in the trial cluster (XV.A.)

T = Trial Date

DATE DUE

ACTIVITY TO BE COMPLETED
NO LATER THAN DATE
DESIGNATED

3rd Thursday of September to 10 days before 1st Thursday of December (for May group) or 3rd Thursday of March to 10 days before first Thursday of June (for November group)

Period to file letter applications for inclusion in trial cluster

Application to include:

- (1) answers to interrogatories;
- (2) responses to request for production;
- (3) signed authorizations to records retrieval service

1st Thursday of December (for May group)
OR 1st Thursday of June (for November Group)

Designation of trial cluster by Court and publication of discovery schedule by Special Master (XV.A.)

D + 3 weeks

Defendants identify discovery and medical liaison counsel for trial group (XIV.B.)

D + 5 weeks

Plaintiffs serve product identification interrogatories and requests for production on defendants.

T – 3 months

Deposition of plaintiffs completed. If plaintiff is unable to testify due to physical illness, mental impairment or death, plaintiff will produce two co-workers for deposition no later than seven days after this date.

T – 2 3/4 months

Defendants respond to plaintiffs' product identification discovery.

T – 2 3/4 months

Third party complaints filed.

T – 2 3/4 months

Plaintiffs serve expert witness reports, including economists, on remaining defendants.

T – 2 1/2 months	Plaintiffs deliver to defense medical liaison counsel all radiology and pathology materials.
T – 2 months	Plaintiffs to provide list of remaining defendants in each case.
T – 2 months	Settlement conferences with remaining defendants.
T – 2 months	Depositions of plaintiffs’ experts completed (as Court permits).
T – 6 weeks	Plaintiffs serve fact witness list.
T – 1 month	Plaintiffs publish revised list of remaining defendants in each case.
T – 1 month	Plaintiffs serve exhibit and expert witness list.
T – 1 month	Defendants serve notices of deposition of plaintiffs’ fact witnesses.
T – 1 month	Defendants serve fact witness list.
T – 1 month	Independent medical examinations of plaintiffs completed.
T – 2 weeks	Plaintiffs serve notices of deposition of defendants’ fact witnesses.
T – 2 weeks	Defendants serve expert witness reports, including economists.
T – 2 weeks	Defendants serve exhibit and expert witness lists.
T – 10 days	Court announces trial group(s).