



clarklovehutson

A Professional Limited Liability Company

September 11, 2020

Judge M.C. Rodgers
United State District Court for the
Northern District of Florida
100 North Palafox Street
Pensacola, Florida 32502

Re: *In re: 3M Combat Arms Earplug Products Liability Litigation*, 3:19-md-2885

Dear Judge Rodgers,

Pursuant to Case Management Order 2, Section IV (Docket No. 452), Lead Counsel for plaintiffs and counsel for Defendants submit this joint letter setting forth the parties' tentative agenda for the September 18, 2020 Case Management Conference.

1. Government discovery update
 - a. Subpoenas to government and government personnel
 - b. Motions to quash and motions to transfer
 - c. Efforts to schedule additional depositions
 - d. Document stipulations
2. Corporate discovery update;
 - a. Depositions;
 - i. Deposition calendar update;
 - ii. Additional 30(b)(6) depositions.
3. Bellwether discovery update;
 - a. Document production issues for Trial Group A Plaintiffs Baker, Hacker, and Rowe
 - b. Additional written discovery served on Group A Plaintiffs;
 - c. Discovery motion practice deadlines for Groups C and D;
 - d. Upcoming Depositions;
 - i. Bellwether Discovery Calendars;
4. Status of DME Discussions
5. VA Authorizations and VA/DOD Production for Cases in the 1%;
 - a. Plaintiffs' Agenda Item: Second Wave of discovery (Additional 1% Pool).

Respectfully submitted,

/s/ Shelley Hutson

Co-Lead Counsel for Plaintiffs