



clarklovehutson

A Professional Limited Liability Company

October 9, 2020

Judge M.C. Rodgers
United States 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 October 16, 2020 Case Management Conference.

1. Government discovery update;
 - a. Motions to Compel, Motions to Quash, and Motions to Transfer;
 - b. Updated productions of V.A. records.
2. Bellwether discovery update;
 - a. Defense Medical Exams of Plaintiffs;
 - b. Bellwether discovery calendar;
 - i. Defendants' motion to take certain depositions after October 9;
 - c. Due date for Plaintiff rebuttal reports;
 - d. Sales representative discovery;
 - e. Timing of expert depositions.
3. Choice of Law update;
4. Status of 1% and related issues.

Respectfully submitted,

/s/ Shelley Hutson

Co-Lead Counsel for Plaintiffs