



AUGUST 13, 2021

VIA EMAIL TRANSMISSION

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

Re: *In Re: 3M Combat Arms Earplug Products Liability Litigation, 3:19-md2885*

Dear Judge Rodgers,

Pursuant to Case Management Order 2, Section IV (Docket No. 452), Co-Lead Counsel for plaintiffs and Counsel for Defendants submit this joint letter setting forth the parties' agenda for the August 20, 2021, Case Management Conference.

- I. Deposition of Colonel (ret.) Jay Vietas re: Air Force Memorandum**
- II. Future Trials and Discovery Cases**
 - a. Expansion (or creation) of New Pool for Case-Specific Discovery
 - b. Future Trial Cases & Consolidation
 - c. Development and Discovery of Remand Case Pools
- III. Updates on Group B Trial Status and Pretrial Deadlines**
 - a. Adkins (September Trial)
 - b. Blum (October Trial)
 - c. Hensley, Sloan, Wayman (January Trial)
- IV. Motion to Dismiss *Lopez* (Group C)**
- V. Update on PTO 81 Implementation (Early Vetting Sub-Committee)**

Sincerely,

Bryan F. Aylstock,
Shelley Hutson, &
Chris Seeger

Plaintiffs' Co-Lead Counsel