

### **Joint Agenda For December 17, 2020 CMC**

1. Government discovery update: subpoenas, motions to transfer, motions to quash and motions to compel
2. Stipulation on government medical depositions, HCPM depositions
3. Stipulation on DoD records that are the subject of a portion of Defendants' motion to compel
4. Update on VA supplemental record production for 23 bellwether cases
5. Update on DOEHRS request to the DOD (for 1% and Beyond)
6. Update on the Court's Request for Comprehensive List of Privacy Act Order (Touhy) Requests made to the DOD/VA for Plaintiffs.
7. Expert depositions and scheduling
8. Production of expert consideration materials
9. Consolidation of Group A bellwether cases
10. Defendants' Motion for Protective Order on Defendants' Rule 26(a)(2) designated experts Elliott Berger and Eric Fallon
11. Scheduling of DMEs for Group C and D