

EXHIBIT F
MODEL DISCOVERY SCHEDULE
FIFO TRIAL CLUSTERS

P = Date of publication of the trial groups
First Monday of each May and November

T = Trial Date

DATE DUE

ACTIVITY TO BE COMPLETED
NO LATER THAN DATE DESIGNATED

P	Publication of trial groups and discovery schedules.
P + 30 Days	Plaintiffs to provide to defendants list of remaining defendants in each case.
P + 45 days	Defendants identify discovery and medical liaison counsel for each trial group by this date.
P + 90 days	Plaintiffs to serve answers to defendants' interrogatories, responses to defendants' requests for production of documents, and provide properly executed document authorizations to the relevant record retrieval services; plaintiffs to serve product identification interrogatories.
P + 240 days	Plaintiffs and key fact witnesses in death cases must be produced for deposition.
T - 6 months	Plaintiffs to serve expert witness reports on remaining defendants.
T - 5.5 months	Plaintiffs to deliver all pathology and radiology materials to defense medical liaison counsel.
T - 5 months	Defendants to serve answers to plaintiffs' product identification interrogatories and responses to plaintiffs' requests for production of documents.
T - 4 months	Plaintiffs to serve fact and expert witness lists.

T – 3.5 months	Defendants to file third-party complaints; depositions of plaintiff’s fact witnesses must be completed; plaintiffs to provide to defendants list of remaining defendants in each case; settlement conferences to commence
T – 3 months	Defendants to serve fact witness lists.
T – 2 months	Depositions of defendants’ fact witness to be completed; independent medical examinations of the plaintiffs to be completed.
T – 1 month	Defendants to serve expert witness reports; plaintiffs to serve exhibit lists.
T – 19 days	Defendants to serve expert witness lists.
T - 14 days	Trial groups selected; defendants to serve exhibit lists.
T - 7 days	Final pre-trial and settlement conference.
T	Jury selection commences; depositions of expert witnesses to be completed.