

# The Law Office of Laraine Pacheco

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## MEMORANDUM

To: All Counsel  
From: Laraine Pacheco, Special Master  
Date: November 21, 2004  
Re: Dearie May 2004 and Nov 2004 cases

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The following is the schedule for the Dearie May 2004 and November 2004 cases:

### May 2004 Cluster

- |          |   |
|----------|---|
| 11/24/04 | Last date for Plaintiffs' counsel to serve fact witness lists, expert witness lists, and expert reports   |
| 12/1/04  | Last date to notice corporate depositions (Must be completed by 1/10)                                     |
| 12/1/04  | Last date for plaintiffs and defendants to notify one another of deficiencies in or outstanding discovery |
| 12/1/04  | First date for defendants to serve NOSJM's  |
| 12/1/04  | Defendants serve fact witness lists and expert witness lists  |
| 12/10/04 | Plaintiffs' counsel submits revised remaining defendant lists to Special Master                           |
| 12/10/04 | Plaintiffs' counsel to supply demands to all defendants   |
| 12/31/04 | Last date for defendants to make summary judgment motions   |
| 1/5/05   | Last date for defendants to provide offers or responses to plaintiffs' demands                            |
| 1/10/05  | Last date for outstanding corporate depositions to be completed   |
| 1/10/05  | Telephone settlement conferences to be scheduled for this week  |

- 1/28/05 Defendants serve expert reports
- 2/1/05 Cases assigned to Trial Judge.

November 04 Cluster

- 12/15/04 Last date for plaintiffs and defendants to notify one another of deficiencies in or outstanding discovery.
- 2/1/05 Last date for plaintiffs to serve expert reports
- 2/15/05 Last date to provide outstanding discovery
- 3/1/05 First date for defendants to serve NOSJM's
- 3/1/05 Plaintiffs' counsel to supply demands to all defendants.
- 3/4/05 Plaintiffs' counsel submits revised remaining defendant lists to Special Master.
- 3/15/05 Last date for defendants to provide offers or responses to plaintiff's demands
- 3/15/05 Plaintiffs serve fact witness lists.
- 3/22/04 Defendants serve fact witness lists.
- 4/1/05 Last date for defendants to make summary judgment motions
- 4/1/05 Defendants serve expert reports

The Special Master will try to fold November 2004 and May 2005 cases into one trial group

All May 2005 deadlines remain in place

Maryellen Connor will act as liaison counsel for other miscellaneous items

NB: Be sure to have spoken with opposing counsel regarding strengths and weaknesses of cases **prior** to settlement conferences