

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re: BRIDGESTONE/FIRESTONE, INC.,) **Master File No. IP 00-9373-C-B/S**
TIRES PRODUCTS LIABILITY LITIGATION) **MDL NO. 1373**
_____)
THIS DOCUMENT RELATES TO:)
ALL FOREIGN ACCIDENT CASES EXCEPT)
“FIRST WAVE” AND “EXPEDITED”)
FOREIGN ACCIDENT CASES)

**ENTRY EXTENDING CASE MANAGEMENT DEADLINES
IN FOREIGN ACCIDENT CASES**

Pursuant to the Entry for January 23, 2003, the case management deadlines in all foreign accident cases in this MDL except those that have been designated as “First Wave” or “Expedited” cases have been extended by 60 days, with the exception of those deadlines relating to foreign law experts. The new deadlines are as follow:

- A. Deadlines for “Second Wave” Foreign Accident Cases
1. The plaintiffs shall serve their non-core expert witness reports by **April 1, 2003.**
 3. The defendants shall serve their non-core expert witness reports by **May 2, 2003.**
 4. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **April 1, 2003.**
 5. The parties’ supplemental non-core expert witness reports shall be served by

May 2, 2003.

6. Case specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **May 16, 2003.**
7. All expert witness discovery shall be completed by **July 7, 2003.**
8. All dispositive motions and all *Daubert* motions shall be filed by **August 15, 2003.** Responses shall be filed within 30 days; replies within 15 days. To the extent that a *Daubert* motion addresses a “core” expert witness, and therefore is applicable to multiple cases, only one motion, listing the cause numbers of all cases in which the expert’s report has been submitted, should be filed.
9. The parties shall exchange lists identifying foreign law experts and the topics on which they are expected to offer expert testimony on or before **March 31, 2003.** Also by this date, any party intending to raise an issue concerning the law of a foreign country shall file a notice as required by Federal Rule of Civil Procedure 44.1.
10. The parties shall serve their foreign law expert witness reports by **May 1, 2003;** responsive foreign law expert reports shall be filed by **June 2, 2003.**
11. All discovery relating to foreign law experts shall be completed by **August 4, 2003.**

B. Deadlines for “Third Wave” Foreign Accident Cases:

1. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they are expected to offer expert testimony

on or before **March 31, 2003**. This deadline does not apply to foreign law experts, who are governed by specific deadlines set forth below.

2. The plaintiffs shall serve their non-core expert witness reports by **May 2, 2003**.
3. The defendants shall serve their non-core expert witness reports by **June 2, 2003**.
4. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **May 2, 2003**.
5. The parties’ supplemental non-core expert witness reports shall be served by **June 2, 2003**.
6. Case specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **June 17, 2003**.
7. All expert witness discovery shall be completed by **August 5, 2003**.
8. All dispositive motions and all *Daubert* motions shall be filed by **September 16, 2003**. Responses shall be filed within 30 days; replies within 15 days. To the extent that a *Daubert* motion addresses a “core” expert witness, and therefore is applicable to multiple cases, only one motion, listing the cause numbers of all cases in which the expert’s report has been submitted, should be filed.

9. The parties shall exchange lists identifying foreign law experts and the topics on which they are expected to offer expert testimony on or before **April 28, 2003**. Also by this date, any party intending to raise an issue concerning the law of a foreign country shall file a notice as required by Federal Rule of Civil Procedure 44.1.
10. The parties shall serve their foreign law expert witness reports by **June 2, 2003**; responsive foreign law expert reports shall be filed by **July 2, 2003**.
11. All discovery relating to foreign law experts shall be completed by **September 4, 2003**.

C. Deadlines for “Fourth Wave” Foreign Accident Cases:

1. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they are expected to offer expert testimony on or before **April 29, 2003**. This deadline does not apply to foreign law experts, who are governed by specific deadlines set forth below.
2. The plaintiffs shall serve their non-core expert witness reports by **May 30, 2003**.
3. The defendants shall serve their non-core expert witness reports by **June 30, 2003**.
4. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert,

by **May 30, 2003**.

5. The parties' supplemental non-core expert witness reports shall be served by **June 30, 2003**.
6. Case specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **July 15, 2003**.
7. All expert witness discovery shall be completed by **September 5, 2003**.
8. All dispositive motions and all *Daubert* motions shall be filed by **October 17, 2003**. Responses shall be filed within 30 days; replies within 15 days. To the extent that a *Daubert* motion addresses a "core" expert witness, and therefore is applicable to multiple cases, only one motion, listing the cause numbers of all cases in which the expert's report has been submitted, should be filed.
9. The parties shall exchange lists identifying foreign law experts and the topics on which they are expected to offer expert testimony on or before **May 29, 2003**. Also by this date, any party intending to raise an issue concerning the law of a foreign country shall file a notice as required by Federal Rule of Civil Procedure 44.1.
10. The parties shall serve their foreign law expert witness reports by **June 30, 2003**; responsive foreign law expert reports shall be filed by **July 30, 2003**.
11. All discovery relating to foreign law experts shall be completed by **October 6, 2003**.

D. Deadlines for "Fifth Wave" and Subsequent Foreign Accident Cases

To determine the applicable deadlines for “Fifth Wave” foreign accident cases—that is, cases that were filed during the second calendar quarter of 2002—add 30 days to the “Fourth Wave” deadlines. For the “Sixth Wave,” add 30 days to the “Fifth Wave” deadlines, etc.

ENTERED this _____ day of January 2003.

V. Sue Shields
United States Magistrate Judge
Southern District of Indiana

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