

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**CASE MANAGEMENT  
ORDER NO. 33B**

## This Order Relates to All Cases

**CASE MANAGEMENT ORDER NO 33B  
(AMENDING THE DEADLINES FOR DISCLOSURE OF EXPERT WITNESSES,  
EXPERT DISCOVERY AND DAUBERT CHALLENGES FOR THYROID AND  
LIVER CANCER)**

On March 26, 2025 this Court issued Case Management Order 33 (ECF No. 6863) setting a schedule for the disclosure of expert witnesses, expert discovery, and *Daubert* challenges related to thyroid cancer and liver cancer. On June 20, 2025 the Court held a Science Day related to these injuries, at which the parties presented expert witnesses to address the Court. On July 7, 2025, the Court amended the schedule for disclosure of expert witnesses, expert discovery, and Daubert challenges. (CMO 33A, ECF No. 7486).

The Court now further amends and extends the schedule for the disclosure of expert witnesses, expert discovery, and *Daubert* challenges related to thyroid cancer and liver cancer as follows:

- By prior agreement of the parties, the Plaintiffs' general causation expert reports were due August 11, 2025 (and were served).
- Defendants' general causation expert reports shall be due October 24, 2025.
- Plaintiffs' rebuttal general causation expert reports, if any, shall be due November 21, 2025.

- The Parties intend that the limitations on expert discovery set forth in Rule 26 of the Federal Rules of Civil Procedure, including the provisions of Rule 26(b)(4)(A)-(D) limiting discovery with respect to draft reports, communications with experts, and depositions of consulting experts, shall apply.

By no later than December 12, 2025, Plaintiff and Defense Co-Lead Counsel shall meet and confer regarding a proposed order setting a schedule for expert depositions and Daubert/Rule 702 briefing. Co-Lead Counsel shall submit to the Court by December 19, 2025, an agreed proposed order or, if unable to agree, competing proposed orders.

**IT IS SO ORDERED.**

Dated: September 30, 2025  
Charleston, South Carolina

s/Richard Mark Gergel  
Hon. Richard M. Gergel  
United States District Judge