

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

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USDC, DISTRICT OF SOUTH CAROLINA
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IN RE: LIPITOR (ATORVASTATIN
CALCIUM) MARKETING, SALES
PRACTICES AND PRODUCTS
LIABILITY LITIGATION

) MDL No. 2:14-mn-02502-RMG
)
) **CASE MANAGEMENT ORDER NO. 30**
)
) **This Document Relates to All Actions.**
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**ORDER GOVERNING ADDITIONAL CASE-SPECIFIC DISCOVERY IN
FIRST CASES SELECTED FOR TRIAL**

1. This CMO governs additional case-specific discovery in the cases that were selected on January 30, 2015, as the first two cases to be tried (hereinafter, the “trial cases” or the “trial Plaintiffs”).
2. The parties shall work cooperatively to discuss any requests by either party for additional or outstanding case-specific documents, new or updated authorizations, or written discovery, and to discuss the nature and timing of depositions.
3. Counsel for the parties shall work cooperatively to schedule additional or continued case-specific fact witness depositions to take place before **May 15, 2015**, unless a party demonstrates good cause for seeking a deposition after that date (where “good cause” shall include, but not be limited to, the witness’s availability).
4. The parties agree that collection of medical, employment, pharmacy, and other records pertaining to the trial Plaintiffs will continue through **September 21, 2015, or four (4) weeks before trial**, whichever is later, absent good cause shown to seek such documents after that date.
5. Pfizer reserves the right to request a medical examination of a trial Plaintiff under the Federal Rules and Plaintiffs reserve the right to object to any such request.

6. Plaintiffs shall advise Pfizer whether Plaintiffs intend to notice a trial or preservation deposition of any healthcare provider who has previously been deposed in the case. Such trial preservation depositions shall be completed no later than **August 15, 2015**.
7. The parties agree that to the extent either side intends to seek to call live at trial a witness who has not been deposed, the party shall so advise the other side at least **eight (8) before trial** so that the other side may notice such witness's deposition to take place at least **four (4) weeks before trial**. This provision is not intended to allow for late disclosure of a new expert.
8. The parties are continuing to confer about case-specific discovery relating to sales representatives identified in the trial cases and may seek the Court's assistance on any issues that they cannot resolve between themselves.

AND IT IS SO ORDERED.


Richard Mark Gergel
United States District Court Judge

February 25, 2015
Charleston, South Carolina