

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: PARAGARD IUD) MDL DOCKET NO. 2974
PRODUCTS LIABILITY)
LITIGATION) 1:20-md-02974-LMM
) **This Document Relates to All Cases**

JOINT NOTICE OF PROPOSED AGENDA ITEMS
FOR THE SEPTEMBER 27, 2022 MDL STATUS CONFERENCE

Pursuant to the Court's Order – Initial Conference, [Doc. 34, ¶2], the Parties have met and conferred and jointly submit for the Court's consideration the following topics as proposed agenda items for the September 27, 2022 MDL Discovery Conference.

1. Report on all related cases pending in state or federal courts and their current status (including number of cases currently pending in MDL No. 2974, cases currently on CTOs and awaiting transfer, and status of any objections to CTOs in the JPML).
2. Scheduling Order;
3. Custodial File Protocol and issues related thereto;
4. Status of Parties' Meet & Confers on Plaintiffs' 30(b)(6) deposition (ESI and Corporate Structure);
5. Update on certain discovery issues ruled upon at the July 2022 Discovery Conference.

Dated: September 22, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 22nd day of September 2022, a copy of the forgoing Joint Notice of Agenda Items for the September 27, 2022 MDL Discovery Conference was served via the Court's ECF system on all counsel of record.

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