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August 16, 2024

VIA ECF FILING

Honorable Nicholas G. Garaufis, District Judge
Honorable Marcia M. Henry, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: MDL No. 3044, *In re: Exactech Polyethylene Orthopedic Products Liability Litigation*,
1:22-md-03044-NGG-MMH – Pretrial Schedules for *Tarloff* and *Larson* Bellwethers**

Dear Judge Garaufis and Magistrate Judge Henry:

In furtherance of the discussion held during the August 12, 2024 status conference with the Court (see Minute Order, 8/12/2024), Plaintiffs and Defendants jointly submit the proposed pretrial schedules at the conclusion of this letter for the first two cases set for bellwether trial, *Tarloff v. Exactech, Inc., et al.* (July 7, 2025 trial date) and *Larson v. Exactech, Inc., et al.* (September 29, 2025 trial date). The parties appreciate the Court's willingness to accommodate the parties' requested extensions.

Tarloff v. Exactech, Inc., et al., 1:23-cv-05793

Task	Previous Deadline	Proposed Deadline
Core Depositions	6/30/2024	8/29/2024
Plaintiffs' Expert Reports	9/30/2024	11/25/2024

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Task	Previous Deadline	Proposed Deadline
Defendants' Expert Reports	11/30/2024	1/13/2025
Rebuttal Experts	12/15/2024	1/20/2025
Plaintiffs' Expert Depositions	1/15/2025	2/20/2025
Defendants' Expert Depositions	2/15/2025	3/19/2025
Pre-Trial Motions	2/28/2025	4/7/2025
Briefs in Opposition	3/28/2025	5/7/2025
Replies, if any	4/11/2025	5/19/2025
Trial	6/2/2025	7/6/2025

Larson v. Exactech, Inc., et al., 2:22-cv-06643

Task	Previous Deadline	Proposed Deadline
Core Depositions	8/29/2024	10/29/2024
Plaintiffs' Expert Reports	11/29/2024	1/29/2025
Defendants' Expert Reports	1/29/2025	3/29/2025
Rebuttal Experts	2/13/2025	4/13/2025

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Task	Previous Deadline	Proposed Deadline
Plaintiffs' Expert Depositions	3/17/2025	5/17/2025
Defendants' Expert Depositions	4/16/2025	6/16/2025
Pre-Trial Motions	4/29/2025	6/29/2025
Briefs in Opposition	5/27/2025	7/27/2025
Replies, if any	6/10/2025	8/10/2025
Trial	8/2/2025	9/29/2025

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*Counsel for Defendants Exactech, Inc.
and Exactech U.S., Inc.*

Application granted.

So Ordered

/s/ Nicholas G. Garauffis

Hon. Nicholas G. Garauffis

Date: 8/16/24