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28**EXHIBIT A****TENTATIVE AGENDA FOR INITIAL CONFERENCE**

The primary objective of the initial conference is to develop an initial plan for the “just, speedy, and inexpensive determination” of the litigation. This plan will include procedures for identifying and resolving disputed issues of law, identifying and narrowing disputed issues of fact, carrying out disclosure and conducting discovery efficiently and economically, and preparing for trial in the absence of settlement or summary disposition. The following should help in the development of the case management plan:

- identifying and narrowing issues of fact and law;
- establishing deadlines and limits on joinder of parties and amended or additional pleadings;
- coordinating with related litigation in federal and state courts, including later filings, removals, or transfers, as well as relating all cases for which there is an outstanding motion to relate;
- effecting early resolution of jurisdictional issues;
- referring, if possible, discovery matters to magistrate judges;
- appointing liaison, lead, and trial counsel and special committees, and maintaining time and expense records by counsel;
- reducing filing and service requirements through a master file and orders under Federal Rule of Civil Procedure 5;
- exempting parties from or modifying local rules or standing orders;
- creating schedules and deadlines for various pretrial phases of the case and setting a tentative or firm trial date;
- discussing any unresolved issues of recusal or disqualification;
- evaluating prospects for settlement or possible referral to mediation or other procedures; and
- instituting any other special procedures to facilitate management of the litigation.

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**EXHIBIT B**  
**AGENDA ITEMS FOR FUTURE CONFERENCES**

- planning for prompt determination of class action questions, including a schedule for discovery and briefing on class issues;
- managing disclosure and discovery;
- setting guidelines and schedules for the disclosure and exchange of digital evidentiary exhibits and illustrative aids;
- establishing procedures for managing expert testimony; and
- setting firm trial date(s).