

1. Expert discovery in the above-captioned matter shall comply with Federal Rule of Civil Procedure 26(a)(2)(B) except that the following shall not be discoverable or disclosed:

- a. the content of communications among and between: (i) counsel to a party and that party's expert witness(es) or consultant(s) and their respective staff, (ii) any expert witness and other expert witness(es) or consultant(s); (iii) any expert witness and their respective staff; and
- b. notes, drafts, written communications or other types of preliminary work created by consultant(s) or expert witness(es) - including, but not limited to, draft expert reports.

2. The protections against discovery agreed to in Paragraph 1(a-b) herein will not apply to any communications or documents upon which an expert relies as a basis for any of his or her opinions or reports.

For Plaintiffs

/s/ Natalie Finkelman
 James C. Shah
 Natalie Finkelman
 Shepherd, Finkelman, Miller & Shah LLP

For Defendant LG USA Electronics, Inc.

/s/ Melissa Steedle Bogad
 Melissa Steedle Bogad
 Winston & Strawn LLP

SO ORDERED this 31st day of December, 2009.

M. Shipp
 HONORABLE MICHAEL A. SHIPP
 UNITED STATES MAGISTRATE JUDGE