## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: PROCESSED EGG PRODUCTS	:	
ANTITRUST LITIGATION	:	MDL No. 2002 08-md-02002
THIS DOCUMENT APPLIES TO: ALL ACTIONS	:	

## <u>ORDER</u>

AND NOW, this 20th day of April, 2010, upon consideration of correspondence received

from counsel dated April 16, 2010, it is hereby ORDERED that:

- 1. On or before May 21, 2010, all parties shall exchange requests for the production of documents with all other parties. Written objections to such requests for production of documents shall be due thirty (30) calendar days after the Court has ruled upon all motions to dismiss plaintiffs' complaints or such other date as the Court may set following consultation with the parties. The date for actual production of the parties' respective responsive documents will be set by the Court. The Court may permit further requests for production of documents upon good cause shown for such further requests.
- 2. At any time after May 21, 2010, the parties are expected to meet and confer in good faith on the following topics:
  - A. General objections to the scope of discovery, particularly any objections that affect the production of documents;
  - B. The scope of electronic discovery, including search methodology to be used and custodians whose files will be searched. Parties are encouraged to exchange organizational charts or other materials that would provide an informed basis for selection of custodians;
  - C. Accessibility issues, including potential problems or issues associated with producing electronic documents and the form(s) in which such documents are to be produced;

- D. Sufficiency of transactional and cost data<sup>1</sup>;
- E. Limitations on discovery, including the number of depositions permitted per side and per party, the length of depositions, and the number of interrogatories that may be propounded;
- F. The co-ordination, timing and scope of third-party discovery;
- G. Whether the parties should enter into a joint contract with a single court reporting service;
- H. Resolve any questions about ESI system architecture and protocols;
- I. Production format issues, if any; and
- J. Coordination of depositions and the subsequent use of deposition testimony and exhibits.

## BY THE COURT:

<u>S/Gene E.K. Pratter</u> GENE E.K. PRATTER UNITED STATES DISTRICT JUDGE

<sup>&</sup>lt;sup>1</sup> Nothing in this paragraph prohibits parties from choosing to produce sample(s) of such data voluntarily if so inclined.