



6. Plaintiffs need sufficient time after receipt of the deposition transcript to prepare any appropriate motion to exclude or limit the testimony of Mr. Fischel under *Daubert*.

7. For these reasons, the parties jointly request that plaintiffs in the Arkansas trial scheduled for May 16, 2011 be granted until March 11, 2011 to file any *Daubert* motion relating to Mr. Fischel, that Bayer be granted until April 1, 2011 to file a response, and that plaintiffs be granted until April 15, 2011 to file a reply.

WHEREFORE, the parties jointly request that the Court grant the relief set forth in paragraph 7 above.

DATED: February 2, 2011

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Don M. Downing\_\_\_\_\_