

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE GENETICALLY MODIFIED RICE)	
LITIGATION)	4:06 MD 1811 CDP
)	
)	ALL CASES
)	

**JOINT MOTION TO MODIFY CERTAIN DEADLINES IN
CASE MANAGEMENT ORDER 16**

The parties are working diligently to complete discovery in the first group of producer cases to be remanded. The parties have met and conferred and hereby jointly move to extend certain deadlines set forth in CMO 16, ¶ III.1, concerning the first group of cases to be remanded.

- All case-specific fact discovery shall be complete by March 15, 2010.
- Plaintiffs shall disclose expert witnesses related to issues of individual damages and provide the reports required by Rule 26(a)(2), Fed. R. Civ. P., no later than April 5, 2010, and shall make these expert witnesses available for depositions, and have depositions completed, no later than April 19, 2010.
- Defendants shall disclose expert witnesses related to issues of individual damages and provide the reports required by Rule 26(a)(2), Fed. R. Civ. P., no later than May 5, 2010, and shall make these expert witnesses available for depositions, and have depositions completed, no later than May 19, 2010.
- All discovery shall be completed no later than May 19, 2010.
- Any motions for summary judgment or motions to exclude or limit expert testimony under *Daubert* or for any other reason must be filed no later than

June 11, 2010. Briefs in opposition must be filed by July 1, 2010, and any reply brief shall be filed no later than July 16, 2010.

Dated: December 3, 2009

Respectfully submitted,

s/ Terry Lueckenhoff

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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2009, 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/Terry Lueckenhoff _____