

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re BAYCOL PRODUCTS  
LITIGATION

: MDL No. 1431  
:  
: (MJD/JGL)  
:  
:

This Document Relates to All Actions

: **REPORT, STIPULATION, AND REQUEST**  
:  
: **FOR ENTRY OF CASE MANAGEMENT,**  
:  
: **DOCUMENT PRESERVATION, AND**  
:  
: **CONFIDENTIALITY ORDERS**  
:  
:  
:

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WHEREAS, this Court's Pretrial Order No. 1, dated January 16, 2002, required the parties to suggest procedures to facilitate the just, speedy and inexpensive resolution of this litigation; and,

WHEREAS, since the Court appointed lead and liaison counsel for the parties in Pretrial Order No. 3, dated February 1, 2002, the parties have met and conferred numerous times, in person and by conference call, to effectuate the Court's directive; and,

WHEREAS, the parties have reached through discussion, compromise and accommodation a common ground with respect to certain pretrial procedures which they believe should be considered for entry as Orders by the Court;

NOW THEREFORE, it is hereby stipulated and agreed by and between counsel for plaintiffs and counsel for the defendants that the Court may enter the following proposed Orders, attached hereto as attachments A, B and C, subject to the Court's approval and after hearing the parties' positions at the pretrial conference scheduled for 10:00 a.m. on March 4, 2002:

- A. CASE MANAGEMENT ORDER (including DEPOSITION GUIDELINES);
- B. ORDER FOR THE PRESERVATION OF DOCUMENTS; and,
- C. ORDER REGARDING CONFIDENTIAL INFORMATION

Respectfully submitted March 1, 2002,

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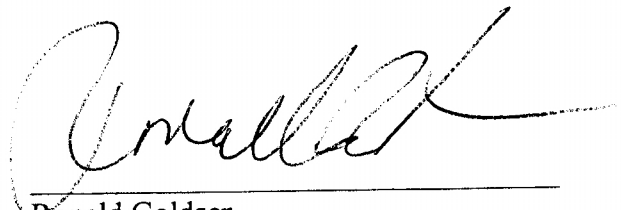
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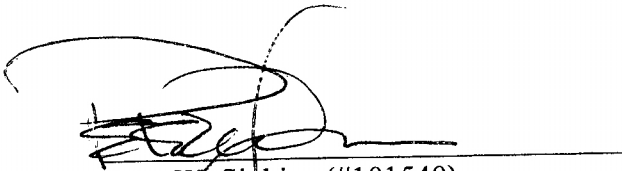
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

In re: BAYCOL PRODUCTS LITIGATION	)	MDL No. 1431 (MJD/JGL)
	)	<b>AGREED</b>
	)	<b>AGENDA FOR STATUS</b>
	)	<b>CONFERENCE</b>
This Document Relates To: All Actions	)	<b>March 4, 2002</b>
	)	

Pursuant to the Manual for Complex Litigation, Third, Section 21.211, the parties propose the following agenda to the Court for the Status Conference scheduled on March 4, 2002:

1. Identification and narrowing of issues of fact and law
2. Reduction in filing and service requirements through use of a master file and orders under Fed. R. Civ. P. 5
3. Coordination with related litigation
4. Early resolution of jurisdictional issues;
5. Report from Co-Lead counsel regarding committee appointments and time/expense record keeping
6. Exemption from or modification of local rules, standing orders
7. Plans for prompt determination of class action questions, including a schedule for discovery and briefing on class issues
8. Management of disclosure and discovery, including such matters as:
  - preservation of evidence
  - use of document depositories and computerized storage

- adoption of a uniform numbering system for documents
- procedures for resolving discovery disputes
- protective orders and procedures for handling claims of confidentiality and

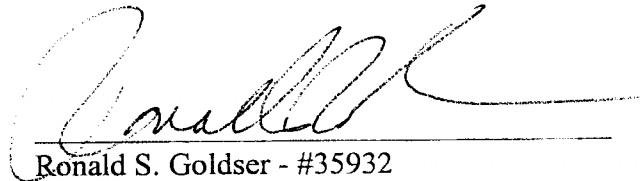
privilege

9. Procedures for management of expert testimony
10. Schedules and deadlines for completion of various pretrial phases of the case

Date:

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ZIMMERMAN REED, P.L.L.P.

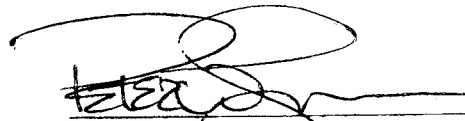


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