

Track 23 / St. Elizabeth Healthcare (MDL No. 2804)**Modified CMO Deadlines**

CMO Paragraph	Current Deadline	Proposed Deadline¹
Document production by all Parties shall be substantially completed (Section F.4.vi)	June 29, 2026	[October 9, 2026]
Deadline to serve third-party subpoenas (Section F.4.vii)	August 28, 2026	November 9, 2026
Close of party fact discovery and third-party discovery (Section F.4.viii)	September 28, 2026	January 22, 2027
Hospital Bellwether Plaintiff shall serve expert reports (Section H.1)	October 12, 2026	February 5, 2027
Hospital Bellwether Plaintiff shall provide for each expert two proposed deposition dates between (Section H.1)	November 2 – December 4, 2026	February 26 – March 30, 2027
Defendants shall serve expert reports (Section H.2)	December 14, 2026	April 9, 2027
Defendants shall provide for each expert two proposed deposition dates between (Section H.2)	January 4 – January 29, 2027	April 30 – May 25, 2027
Deadline to file dispositive and <i>Daubert</i> motions (Section I)	February 11, 2027	June 7, 2027
Deadline to file responses to dispositive and <i>Daubert</i> motions (Section I)	March 22, 2027	July 16, 2027
Deadline to file replies in support of dispositive and <i>Daubert</i> motions (Section I)	April 20, 2027	August 16, 2027

¹ The proposed deadlines are premised on Plaintiff's representation that it will substantially complete its productions by October 9, 2026. The parties agree that if Plaintiff does not substantially complete its productions by then, the parties will discuss additional necessary extensions.