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

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IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

MDL No. 2323 12-md-2323

THIS DOCUMENT RELATES TO: ALL ACTIONS

CASE MANAGEMENT ORDER NO. 2

AND NOW, this 26th day of April 2012, following the April 25, 2012 Initial Organization

Conference, it is ORDERED:

I. The Court makes the following appointments:¹

1. Co-Lead Counsel

- Christopher A. Seeger, Esq. is designated Plaintiffs' Co-Lead Counsel.
- By May 9, 2012, the Plaintiffs' Executive Committee shall report back to the Court its choice for local Co-Lead Counsel from Philadelphia-based lawyers.

2. Executive Committee

Plaintiffs' Executive Committee shall consist of the following members:

• Anapol Schwartz

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- Sol H. Weiss, Esq.
- Larry E. Coben, Esq.
- Girardi Keese
 - Thomas V. Girardi, Esq.

¹ The Court reserves the right to modify its appointments throughout the duration of the litigation.

- Graham B. LippSmith, Esq.
- Hausfeld LLP
 - Michael D. Hausfeld, Esq.
 - Richard S. Lewis, Esq.
- Locks Law Firm
 - Gene Locks, Esq.
 - David Langfitt, Esq.
- Podhurst Orseck, P.A.
 - Ricardo M. Martinez-Cid, Esq.
 - Steven C. Marks, Esq.
- Seeger Weiss LLP
 - Christopher A. Seeger, Esq.
 - David R. Buchanan, Esq.

3. Steering Committee

Plaintiffs' Steering Committee shall consist of the following members:

- James R. Dugan, II, Esq.
- Anthony Tarricone, Esq.
- Arnold Levin, Esq.
- Michael L. McGlamry, Esq.
- Dianne M. Nast, Esq.
- David A. Rosen, Esq.
- Charles S. Zimmerman, Esq.

The Steering Committee shall take under advisement the applications of David S. Casey, Jr., Esq. and Derriel C. McCorvey, Esq. By **May 9, 2012**, the Steering Committee shall propose a complete list of its members and file the proposal with the Court.

4. Liaison Counsel

- Jeannine M. Kenney, Esq. is designated Plaintiffs' Liaison Counsel.
- Dana B. Klinges, Esq. is designated NFL Defendants' Liaison Counsel.
- Thomas P. Wagner, Esq. is designated Riddell Defendants' Liaison Counsel.

II. The Court will consider the following motions on an expedited basis:

- NFL Defendants' Motion to Dismiss on preemption grounds
- Riddell Defendants' Motion to Sever

III. Key Dates

By May 9, 2012	Plaintiffs' Executive Committee must submit its choice for local Co-Lead Counsel from Philadelphia-based lawyers. Plaintiffs' Steering Committee must submit a complete list of its members.
By June 8, 2012	Plaintiffs must submit a master administrative complaint and an agreed upon short form complaint.
By June 19, 2012	Plaintiffs may file a request for discovery.
By June 19, 2012	NFL Defendants and Riddell Defendants may file briefs with the Court raising any issues they have with the master administrative complaint.
By June 29, 2012	NFL Defendants and Riddell Defendants may file responses to the discovery request.
By June 29, 2012	Plaintiffs may file a reply to the Defendants' briefs raising issues with the master administrative complaint.
By July 16, 2012	Plaintiffs, in the MDL at the time of entry of this Order, must file short form complaints.*Plaintiffs who join this MDL after the entry of this Order must file short form complaints within 30 days of joining the MDL.
By August 9, 2012	NFL Defendants may file a motion to dismiss and Riddell Defendants may file a motion to sever (30 Page Limit/each).
By October 10, 2012	Plaintiffs may file responses (30 Page Limit/each).
By November 26, 2012	NFL Defendants and Riddell Defendants may file replies (15 Page Limit/each).

IV. Additional

- The Court will issue additional Orders as needed.
- Until further Order of the Court, the Court will schedule a conference call with all relevant parties at the request of Liaison Counsel.
- Two hard copies of all filings must be sent to chambers.
- Any questions concerning the procedure for filing should be addressed to Tom Dempsey in the Office of the Clerk of this Court. His telephone number is 267-299-7018; his email address is Tom_Dempsey@paed.uscourts.gov.

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Anita B. Brody

Date

United States District Judge

Copies VIA ECF on _____ to:

Copies MAILED on _____ to: