

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

<b>IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION</b>	:	
	:	
	:	
	:	<b>MDL No. 2323</b>
	:	<b>12-md-2323</b>
	:	
<b>THIS DOCUMENT RELATES TO: ALL ACTIONS</b>	:	
	:	

**CASE MANAGEMENT ORDER NO. 2**

**AND NOW**, this 26<sup>th</sup> day of April 2012, following the April 25, 2012 Initial Organization Conference, it is ORDERED:

**I. The Court makes the following appointments:<sup>1</sup>**

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

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<sup>1</sup> 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**

<b>By May 9, 2012</b>	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.
<b>By June 8, 2012</b>	Plaintiffs must submit a master administrative complaint and an agreed upon short form complaint.
<b>By June 19, 2012</b>	Plaintiffs may file a request for discovery.
<b>By June 19, 2012</b>	NFL Defendants and Riddell Defendants may file briefs with the Court raising any issues they have with the master administrative complaint.
<b>By June 29, 2012</b>	NFL Defendants and Riddell Defendants may file responses to the discovery request.
<b>By June 29, 2012</b>	Plaintiffs may file a reply to the Defendants' briefs raising issues with the master administrative complaint.
<b>By July 16, 2012</b>	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.
<b>By August 9, 2012</b>	NFL Defendants may file a motion to dismiss and Riddell Defendants may file a motion to sever (30 Page Limit/each).
<b>By October 10, 2012</b>	Plaintiffs may file responses (30 Page Limit/each).
<b>By November 26, 2012</b>	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.

Anita B. Brody

\_\_\_\_\_  
Date

\_\_\_\_\_  
United States District Judge

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